Division of Waste Management and Radiation Control

USED OIL PROCESSOR PERMIT

Permittee Name:	**Red Giant Oil Company LLC**
Permittee Mailing Address:	1701 South 3rd Street Council Bluffs, IA 51503
Permittee Phone Number and E-mail:	(712) 323-2441 (office) mail@redgiantoil.com
Permittee and Facility Contact:	Al Foreman, Director of Operations 3720 Lesikar Lane Joshua, TX 76058 (817) 202-1070 alf@redgiantoil.com
Facility Addresses:	2785 Industrial Road Ogden, UT 84401
Type of Permit:	Used Oil Processor Permit
Permit #:	**UOP-0150**
Original Date of Issuance:	July 13, 2015
EPA ID #:	UTR000011700

Signature: _____ Date: _____

Ty L. Howard, Director
Division of Waste Management and Radiation Control

Processor Facility Standard Conditions

I.A. Effect of Permit

I.A.1. Red Giant Oil Company LLC (hereafter referred to as the Permittee) is hereby authorized to operate as a used oil processor in accordance with all applicable requirements of R315-15 of the Utah Administrative Code, the Used Oil Management Act (the Act) 19-6-701 et seq, Utah Code Annotated and this Permit.

I.A.2. This Permit shall be effective for ten years in accordance with R315-15-15 of the Utah Administrative Code. This Permit shall be reviewed by the Director five years after the Permit's issuance or when the Director determines that the Permit requires review.

I.A.3. Attachments incorporated by reference are enforceable conditions of this Permit, as are documents incorporated by reference into the attachments. Language in this Permit supersedes any conflicting language in the attachments or documents incorporated into the attachments.

I.B. Permit Revocation

I.B.1. Violation of any permit condition or failure to comply with any applicable provision of the applicable statutes and rules shall be grounds for imposing statutory sanctions, including revocation of the permit.

I.B.2. It shall not constitute a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the Permittee's business activity in order to maintain compliance with the conditions of this Permit and its attachments.

I.C. Permit Modification

I.C.1. The Permittee may request modifications to any item or operational activity covered by this Permit by submitting a written permit modification request to the Director. If the Director determines the modification request is substantive, a public hearing, a 15-day public comment period or both may be required before issuances of a decision action by the Director on the modification request. Implementing a modification prior to the Director's written approval constitutes a violation of this Permit and may be grounds for enforcement action or permit revocation.

I.C.1.a. Changes in operational activities include any expansion of the facility beyond the areas designated, alteration of processing operational parameters, changes in the type or number of storage tanks, piping, other processing equipment and changes to the contingency plan. The Director may require the Permittee to submit additional information when reviewing permit modification requests to ensure the safe handling of used oil at the processing facility in accordance with 19-6-710 (3)(b)(xii) of the Utah Administrative Code.

I.C.2. The Director may modify this Permit as necessary to protect human health and the environment or because of statutory or regulatory changes.

I.D. Facility Maintenance and Required Emergency Equipment

I.D.1. The Permittee shall maintain and operate the Processor Facility to minimize the possibility of fire, explosion or sudden or non-sudden release of used oil to air, ground, soil, surface and groundwater and sewer systems that could threaten human health and the environment.

I.D.2. The Permittee shall have communication systems, alarms and fire suppression equipment in place at the facility, as well as arrangements with local emergency response teams (i.e. fire, police, and hospital) in accordance with R315-15-5.3 of the Utah Administrative Code.

I.D.3. The Permittee shall have written documentation of the inspection and maintenance of used oil processing equipment, containers, tanks, fire suppression systems (portable and fixed) and testing of emergency alarms for fire and other operational alarms set for processing equipment. The Permittee shall determine, document in writing, and adhere to the scheduled frequency for inspections, maintenance, and alarm testing to ensure safe operation in accordance with the Permittee's Standard Operating Procedures.

I.D.4. To prevent access by unauthorized persons or vehicles during hours when the facility is closed and authorized personnel are not present, the Permittee shall lock the entrance security gate and maintain adequate perimeter fencing.

I.E. Spill and Contingency Plan and Reporting Requirements

I.E.1. The Permittee shall take all reasonable steps to minimize releases to the environment and shall carry out such measures as are necessary to protect human health and the environment. In the event of a release of used oil, the Permittee shall immediately take appropriate actions to comply with the Emergency Controls required by R315-15-9 of the Utah Administrative Code, this Permit, and the Permitee's Spill and Contingency Plan in Attachment 3 of this permit.

I.E.2. A secondary containment system for used oil process and storage tanks, piping and ancillary equipment shall be constructed and maintained for the facility in accordance with R315-15-5.5(c) of the Utah Administrative Code. The joints between the concrete floor and the tank pads shall be sealed to prevent migration of oil to the soil and groundwater.

I.E.3. Used oil, water or other liquids that may accumulate in the secondary containment system or any ancillary facility sumps shall be removed within 24 hours of discovery to prevent the possible migration to soil, ground or surface waters.

I.E.4. The Permittee shall document the inspections of the secondary containment system at least weekly. Inspection documents shall include inspector's name, date, areas inspected, any problems found, and the subsequent actions taken by the facility to maintain system integrity.

I.E.5. The Permittee shall notify the Utah Department of Environmental Quality 24-hour Answering Service, (801) 536-4123, for used oil releases exceeding 25 gallons or for smaller releases that pose a potential threat to human health or the environment in accordance with R315-15-9 of the Utah Administrative Code.

I.E.6. The Permittee shall notify the Director within 24 hours of any used oil found at the facility with PCB concentrations greater than or equal to 2 parts per million (ppm).

I.E.7. In accordance with R315-15-9.4 of the Utah Administrative Code, the Permittee shall submit to the Director a written report within 15 days of any reportable release of used oil.

I.E.8. All information required by R315-15-9.4 of the Utah Administrative Code shall be included in the report. The report shall also include a description of actions taken by the Permittee to prevent future spills.

I.E.9. The Permittee shall document and maintain analytical and disposal records for a minimum of three years. The Permittee shall also characterize waste generated during the spill cleanup to determine if the waste is hazardous or non-hazardous in accordance with R315-15-8 of the Utah Administrative Code.

I.F. Records and Retention Requirements

I.F.1. The Permittee shall maintain all used oil records required by R315-15 of the Utah Administrative Code and this Permit at the Permitee's offices located at 1701 South 3rd Street, Council Bluffs, Iowa. Records may be in hard copy or in an electronic format and shall be readily accessible for inspection by authorized representatives of the Director. The Permittee shall maintain, for a minimum of three years, all applicable used oil processor associated records required by R315-15 of the Utah Administrative Code and this Permit, with the exception of the operating record, which shall be kept until facility closure.

I.F.2. **Operating Record**

I.F.2.a. The Permittee shall maintain an operating record (paper or electronic) until final closure of the facility. The operating record shall include the date, the name of the processing facility equipment operator, the processing system start-up and shut-down times, any upset condition (e.g. alarms, mechanical failure, or any event that requires implementation of the facility's Contingency Plan), records and results of

used oil analyses, daily tank storage volumes and the daily volume of oily water processed through the system, including the wastewater discharge records.

I.F.3. **Tracking Records**

I.F.3.a. The Permittee shall keep a unique written record for both the collection and delivery of used oil. Acceptance and delivery records shall be in the form of a log, invoice, manifest, bill of lading, or other shipping document. Collection and delivery records shall include halogen screening results.

I.F.3.b. The Permittee's name, address, EPA identification number, and date of transaction shall be recorded on records of all used oil entering and leaving the facility. The tracking documents shall also include the volume of used oil accepted by or shipped from the facility. These records shall also include the used oil transporter's name, written signature, address and EPA identification number.

I.G. Analysis Plan

I.G.1. The Permittee shall follow all sampling and analytical procedures in Section II.C of the Permit, Used Oil Collection and Analytical Procedures, when conducting used oil sampling and analytical testing to meet the requirements of R315-15 of the Utah Administrative Code.

I.H. Prohibitions

I.H.1. The Permittee shall not manage used oil in surface impoundments or waste piles unless the units are subject to regulation under R315-7 or R315-8 of the Utah Administrative Code.

I.H.2. Used oil shall not be placed, discarded or otherwise disposed of in any solid waste disposal facility operated by a political subdivision or a private entity or in sewers, drainage systems, septic tanks, surface or ground waters, watercourses or on the ground.

I.H.3. The Permittee shall manage mixtures of used oil and hazardous waste in accordance with R315-15-1.1 of the Utah Administrative Code when determining if the used oil is subject to hazardous waste regulations or used oil regulations.

I.H.4. Used oil shall not be stored in tanks, containers or piping that have previously stored hazardous waste, unless the tanks, containers, and piping are emptied as described in R315-2-7 of the Utah Administrative Code prior to storing or transferring used oil.

I.H.5. Used oil shall not be stored in tanks, containers or piping that have previously stored PCB contaminated materials at or above 2 ppm, unless the tanks, containers and piping or storage units are decontaminated as described in 40 CFR 761 Subpart S prior to storing or transferring used oil. Any used oil that was mixed with the PCB-contaminated material shall be managed in accordance with R315-15-18 of the Utah Administrative Code and 40 CFR 761 Subpart S, as applicable.

I.I. Waste Management/Disposal

I.I.1. The Permittee shall determine through characterization, before disposal, if used oil or solid waste generated from spills or operational activities is hazardous or non-hazardous waste.

I.I.2. The Permittee shall document and maintain records showing proper characterization, handling and disposal for all used oil related waste, including oily wastewater if sent for disposal.

I.I.3. The Permittee may dispose of non-hazardous used oils in accordance with R315-15-1.3 and R315-15-8.2(b) of the Utah Administrative Code.

I.I.4. The Permittee shall not utilize used oil as a dust suppressant, weed suppressant, for road oiling, or for other similar uses that have the potential to release used oil into the environment.

I.I.5. The Permittee shall follow the Waste Disposal Plan in Attachment 5 of this permit.

I.J. Financial Requirements

I.J.1. The Permittee shall be financially responsible for cleanup and closure costs, general liabilities (e.g.-for the public, employees, and contractors), and environmental pollution legal liability for bodily or property damage to third parties resulting from sudden release of use oil in accordance with R315-15-10 through 12 of the Utah Administrative Code and this Permit.

I.J.2. The Permittee shall submit a permit modification request to the Director for any changes in the extent, type or amount of the environmental pollution legal liability or financial assurance mechanism for coverage of physical or operational conditions at the facility that change the nature and extent of cleanup and closure costs. Director review and approval is required prior to implementation of changes.

I.J.3. **Clean up and Closure**

I.J.3.a. The Permittee shall have a written cleanup and closure plan (see Section II.D.) that ensures the removal of all used oil and used oil residues and the remediation of any releases of contaminants to surface waters, groundwater and soils.

I.J.3.b. The Permittee shall update its cleanup and closure plan cost estimates and provide the update estimated to the Director, in writing, within 60 days following a facility modification that causes an increase in the amount of the financial responsibility required under R315-15-10 of the Utah Administrative Code. Within 30 days of the Director's written approval of a permit modification for the cleanup and closure plan that would result in an increase cost estimate, the owner or operator shall provide to the Director the information specified in R315-15-11.2(b)(2) of the Utah Administrative Code.

I.J.3.c. The Permittee shall initiate closure of the facility within 90 days after the Permittee receives the final volume of used oil or after the Director revokes the Permittee's Processor Permit in accordance with the requirements of R315-15-11.3 of the Utah Administrative Code and this Permit.

I.J.3.d. Within 60 days of completion of cleanup and closure, the Permittee shall submit to the Director, by registered mail, a certification that the facility has been closed in accordance with R315-15-11.4 of the Utah Administrative Code and the specifications of the approved cleanup and closure plan. An independent, Utah-registered professional engineer and the Permittee shall sign the closure certification.

I.J.3.e. Additional sampling and remediation may be required by the Director to verify that cleanup and closure has been completed according to R315-15 of the Utah Administrative Code.

I.K. Used Oil Training

I.K.1. The Permittee shall train employees that handle used oil in the applicable regulatory requirements of R315-15 of the Utah Administrative Code and the requirements of this Permit.

I.K.2. The Permittee shall develop and implement a written training plan (see Attachment 4). Employee training shall include identification of used oil, recordkeeping requirements and facility used oil procedures for the handling, storing, sampling, and analysis of used oil, emergency response, spill reporting and personal safety.

I.K.3. The Permittee shall train new and existing employees in the handling of used oil and PCB contaminated used oil. New employees may not manage or process used oil without a trained employee present until their used oil training is completed.

I.K.4. Employees authorized to test used oil shall demonstrate competence to lock-down the tank/container, collect a representative used oil sample, screen used oil for halogens using a Clor-D-Tect kit (EPA method 9077) or prepare required documentation to submit sample to the laboratory for analysis.

I.K.5. The Permittee shall provide, at a minimum, an annual used oil-training refresher course for employees handling used oil. Additional training is required when the Permittee changes used oil-handling operational procedures.

I.K.6. The Permittee shall keep training records for each employee for a minimum of three years. Employees and supervisors shall sign and date training attendance sheets to document class attendance.

I.L. Used Oil Handler Certificate

I.L.1. In accordance with R315-15-13.8 of the Utah Administrative Code, the Permittee shall not operate as a used oil processor without obtaining annually, a Used Oil

Handler Certificate from the Director. The Permittee shall submit a used oil handler fee, pursuant to Utah Administrative Code Annotated Section 63J-1-504, by December 31 of each calendar year to receive certification for the subsequent calendar year.

I.M. Inspection and Inspection Access

I.M.1. Any duly authorized representative of the Director may have access to and the right to copy any records relating to used oil activities. Authorized officers may use any reasonable means to document inspection activities (e.g. photographic, videotape, or electronic). In addition, the authorized officers may collect environmental soil, ground water, or surface water samples to evaluate the impact of the facility's used oil operations.

I.M.2. Failure to allow reasonable access to the property by authorized employees is a "denial of access" and may be grounds for enforcement action or permit revocation.

I.N. Annual Report

I.N.1. As required by R315-15-13.5(d) of the Utah Administrative Code, the Permittee shall prepare and submit an Annual Report to the Director by March 1 of the following year. The report shall describe used oil activities in Utah and required financial assurance documentation.

I.O. Other Laws

I.O.1. Nothing in this permit shall be construed to relieve the Permittee from the obligation to comply with any Federal, State or local law.

I.P. Transfer of Permit

I.P.1. The Permittee shall not transfer this Permit to another owner or operator without written authorization from the Director.

I.Q. Enforceability

I.Q.1. Resolution of violations documented through the enforcement process pursuant to Utah Code Annotated 19-6-112 may include penalties in accordance with R315-102 of the Utah Administrative Code.

I.R. Effective Date

I.R.1. The permit is effective on the date of signature by the Director.

Facility Processing Operations

II.A. Processor Operations

II.A.1. The Permittee is authorized to store a maximum of 277,000 gallons of used oil in tanks, containers and vehicles described in Attachment 1 of this permit.

II.A.2. The Permittee may only accept used oil from a Utah-permitted used oil transporter or deliveries of exempted oily wastewater from waste haulers that maintain all required permits or registrations with the state, counties or municipalities.

II.A.3. Two trained personnel shall be present when used oil is transferred between tanks and used oil transportation vehicles.

II.A.4. The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion or any unplanned sudden or non-sudden release of used oil to air, soil, surface water or groundwater that could threaten human health or the environment.

II.A.5. The Permittee shall conduct inspections of used oil storage containers, tanks and secondary containment systems in accordance with Section 9.13 of Attachment 3 of this permit. The Permittee shall record the inspector's name, the time and date of the inspection and the condition of the tanks, storage containers and secondary containment systems. The Permittee shall document in the inspection log any issues discovered during the inspections (e.g. leaking tanks or water accumulation) and any actions taken by the Permittee to resolve these issues.

II.A.6. The Permittee shall label used oil storage tanks, piping, drums, and containers with the words "used oil."

II.A.7. The Permittee shall keep drums and containers of used oil closed except while removing or adding used oil.

II.B. Facility Used Oil Process Description

II.B.1. The Permittee may accept, store and process used oil via gravity separation.

II.B.2. The Permittee shall only accept used oil from permitted used oil transporters using permitted on-road vehicles and rail tanker cars with a volume not exceeding 25,000 gallons.

II.B.3. Used oil brought into the facility shall be placed into the holding tanks (Tanks 1, 2, and 3) until it has been determined to be on-specification oil by a Utah-registered used oil marketer.

II.B.4. The Permittee may facilitate gravity separation by using demulsifying additives in Tanks 1, 2, and 3 and by heating used oil up to 180^{o}F in Tanks 2 and 3. The Permittee shall heat used oil in these tanks using heating coils. Facility processing activities are described in Attachment 1, General Operations.

II.B.5. After used oil in the holding tanks (Tanks 1, 2, and 3) is determined to be on-specification by a Utah-registered used oil marketer, the oil may be moved to the finish tanks (Tanks 4 and 5). Facility tanks are described in Table II.B below and Attachment 1 of this permit.

II.B.6. Used oil shall only be transported from the facility by permitted used oil transporters unless this oil is marketed directly to a facility that re-refines the used oil into lubricants in accordance with R315-15-1.1(e) of the Utah Administrative Code.

Table II.B: Facility Tanks

Tank Designation & Location	Capacity (gal)	Tank Use
Tank 1 Main Tank Farm	33,000	Used oil storage and gravity separation using demulsifying agents and heat
Tank 2 Main Tank Farm	33,000	Used oil storage and gravity separation using demulsifying agents and heat
Tank 3 Main Tank Farm	33,000	Used oil storage and gravity separation using demulsifying agents and heat
Tank 4 Main Tank Farm	51,000	Storage of on-specification used oil
Tank 5 Main Tank Farm	51,000	Storage of on-specification used oil
Tank 6 Main Tank Farm	11,000	Storage of used oil or diesel
Tank 7 Warehouse Bldg.	6,800	Storage of new lube oil
Tank 8 Warehouse Bldg.	6,800	Storage of new lube oil
Tank 9 Warehouse Bldg.	6,800	Storage of new lube oil
Antifreeze Tank Main Tank Farm	3,000	Storage of antifreeze
Antifreeze Tank Main Tank Farm	3,000	Storage of antifreeze

II.C. Used Oil Acceptance and Analytical

The Permittee shall follow the sampling and analytical conditions in Condition II.C of this permit and the Used Oil Analysis Plan in Attachment 2 of this permit.

II.C.1. **Halogen Field Screening Methods**

II.C.1.a. Prior to accepting used oil or oily water subject to R315-15 of the Utah Administrative Code from a used oil transporter, the Permittee shall screen or require the transporter to screen the incoming used oil using the procedure described in Attachment 2 of this permit.

II.C.1.b. The Permittee shall document on acceptance records the screening results to determine if the total halogens concentration of the incoming used oil is less than 1,000 ppm.

II.C.1.c. Regardless of the water content, any oily water subject to R315-15 of the Utah Administrative Code shall be labeled and stored as used oil in accordance with R315-15 of the Utah Administrative Code and this Permit.

II.C.2. **Sample Collection Requirements**

II.C.2.a. To screen for halogens as described Condition II.C.1, the Permittee shall collect a representative sample from incoming tanks, totes, drums or other containers. Sampling personnel shall be trained on appropriate sampling methods for each type of container and matrix.

II.C.2.b. Samples collected from containers greater than 55 gallons shall be individual samples, not composite samples.

II.C.2.c. The Permittee may composite samples from up to four drums or containers with 55 gallons or less of used oil so long as the source of the used oil is from the same generator and process.

II.C.2.d. A COLIWASA shall be used to collect samples from drums or containers less than or equal to 55 gallons.

II.C.2.e Tank samples shall be collected in accordance with ASTM D7831-13 or other equivalent method approved by the Director.

II.C.3. **Halogen Laboratory Analytical Methods**

II.C.3.a. In lieu of screening with a CLOR-D-TECT® kit, the Permittee may collect and submit representative used oil samples to a Utah-certified laboratory to analyze for total halogen concentrations using EPA Method 9076 or other equivalent method approved by the Director prior to placing used oil into the processing system.

II.C.4. **PCB Contaminated Used Oil**

II.C.4.a. Prior to accepting used transformer oil, the Permittee shall obtain analytical data confirming the PCB concentration of the used oil is less than 2 mg/kg (ppm).

II.C.4.b. The Permittee shall not accept for storage or processing used oil with PCB concentrations greater than or equal to 2 mg/kg.

II.C.4.c. Records of any laboratory test results used to demonstrate PCB concentrations shall be attached to the facility's acceptance records. Used oil may not be diluted to avoid any provision in any federal or state environmental regulation or rule.

II.C.5. **Rebuttable Presumption**

II.C.5.a. Used oil that fails the halogen screen or analytical results with concentrations greater than 1,000 ppm is presumed to have been mixed with a hazardous waste.

II.C.5.b. The Permittee may rebut the hazardous waste presumption in accordance with R315-15-4.5 of the Utah Administrative Code if the Permittee can demonstrate that the used oil does not contain significant concentrations of any of the halogenated hazardous constituents listed in Appendix VIII of EPA CFR 40, Part 261.

II.C.5.c. Halogenated compounds that must be considered in the rebuttable presumption are listed in 40 CFR 261 Appendix VIII, which includes volatiles, semi-volatiles, PCBs, pesticides, herbicides and dioxin/furans.

II.C.5.d. The rebuttable presumption does not apply to metalworking oils/fluids containing chlorinated paraffins if they are processed through a tolling arrangement as described in Subsection R315-15-2.5(c), of the Utah Administrative Code to reclaim metalworking oils/fluids. The presumption does apply to metalworking oils/fluids if such oils/fluids are recycled in any other manner or disposed.

II.C.5.e. Used oil that exceeds the halogen content of 1,000 ppm is presumed to be a hazardous waste and shall not be placed into the facility tanks, vehicles or storage vessels unless the Permittee rebuts the hazardous waste presumption in accordance with the rebuttable presumption requirements above.

II.D. Facility Closure

II.D.1.a. At time of closure, the Permittee shall implement the approved closure plan found in Attachment 6 of this permit to evaluate potential impacts of used oil operations on the surrounding soil, groundwater, and surface water at the facility in accordance with R315-15-11 of the Utah Administrative Code and this Permit. The Permittee shall be responsible for any cleanup of any used oil contamination of soil, groundwater and surface waters on the property and contamination that has migrated beyond the facility property boundaries in accordance with R315-15-11(d) of the Utah Administrative Code.

II.D.1.b. Closure of the facility shall include, but not be limited to, used oil tanks, storage areas, loading docks, sumps and other ancillary equipment and piping. Table 6-1 in Attachment 6 provides the estimated closure cost for soil and groundwater investigation.

II.D.1.c. In addition to conditions found in Condition II.D, the Permittee shall follow the cleanup and closure plan in Attachment 6 of this permit.

II.D.2. <u>Closure Certification</u>

The Permittee shall, within 60 days of completion of cleanup and closure, submit to the Director, by registered mail, a certification that the used oil facility has been cleaned and closed in accordance with R315-5-11 of the Utah Administrative Code.

II.D.3. Soil and Groundwater Testing (Task 1)

II.D.3.a. At time of the closure of the facility, the Permittee shall follow the sampling procedures detailed in the Closure Plan in Attachment 6 to determine potential contamination from operational activities. The Permittee shall submit a Level IV data validation analytical package from a Utah- certified laboratory, within 30 days of receipt, to the Director for review and approval.

II.D.4. Plant Decommission Certification (Task 2)

II.D.4.a. Unless otherwise approved by the Director, plant decommission at time of closure requires removal of all used oil. Other media shall be recovered from all containers and any other ancillary equipment.

II.D.4.b. The Permittee shall characterize the used oil at time of closure to determine the proper method for recycling or disposal.

II.D.4.c. Rinsate water and solids generated from used oil cleaning operations shall be transported to an appropriately permitted recycling or waste disposal facility.

Attachment 1
General Operations

2.0 General Facility Description and Procedures

Red Giant Oil Company LLC is not currently processing used oil at the facility, nor has it done so in the past other than storing used oil filters. The following narrative describes how the facility was designed to process used oil when the permit was first issued:

Red Giant Oil Company (formerly Tri State Recycling Services Inc.) is a used oil recycler offering services and products to various industries. The facility location is 2785 Industrial Drive in Ogden, Utah, in the Ogden Industrial Park. Land use in this Park is zoned heavy industrial. The compliance with this type of facility with the local zoning requirements has been approved by the City of Ogden Planning Commission.

Processing and used oil handing at the Red Giant Ogden facility includes first allowing oil and water to separate (using gravity with no centrifuging) in holding tanks and decanting water from the bottoms of the tanks. Any water that is separated from the used oil is transferred to an appropriately permitted facility for treatment. Oily solids that accumulate at the bottoms of holding tanks is hauled to and disposed of at Red Giant Oil's Newcastle, Wyoming facility using appropriate handing and transporting procedures. There is no filtering and/or other types of processing of used oil that occurs at the Red Giant Ogden facility, although used oil in Tanks 1, 2, and 3 may be treated with a demulsifying additive to enhance gravity separation. There are also heating coils in Tanks 2 and 3 to help with the oil/water separation process.

Red Giant Oil Company services typically begin with contact from a used oil generator who is requesting pickup of used oil. When we receive a call for used oil collection, it is logged by our dispatcher and logistically planned for pickup. The source of the used oil is identified prior to pickup. Red Giant Oil will then dispatch a truck with a capacity that typically ranges from 4,200 to 4,800 gallons.

Prior to loading any oil into a Red Giant vehicle, a representative sample of the oil is tested for levels of chlorinated compounds using a Dexsil Clor-D-Tect Q4000 (see Appendix C for method details). When the truck reaches the facility and used oil has been mixed from multiple collection points, a composite sample of the oil to be pumped is again checked for total halogens using the Dexsil Clor-D-Tect Q4000 method before the oil is off loaded. This screening prior to off-loading may involve collecting samples from multiple compartments of the truck and the collection from any 'pup' or secondary container. All used oil with halogen levels that are determined to be above 1000 parts per million using the initial field test method is rejected until further testing is done.

The vast majority of used oil received by Red Giant Oil is not oil that would historically contain PCBs (oils that could contain PCBs include transformer oil, high-pressure hydraulic

oils, capacitor oil, heat transfer fluids, and oil from oil cooled electric motors). When the types of oil that may contain PCBs are to be received, however, Red Giant Oil shall ensure that a Utah-registered Marketer certifies that these oils contain less than 2 ppm prior to transfer to our facility. This certification shall include testing by a Utah Certified Laboratory where samples are verified to have a PCB content of less than 2 ppm. Lab testing for PCBs shall be provided by either the oil supplier or by Red Giant Oil.

If halogen levels in received used oils are determined to be less than 1000 ppm based on the field test method, the used oil is pumped onto our truck for transport to our facility. The Red Giant Oil driver then quantifies the volume of collected oil and documents on a manifest document. Copies of manifest documents are maintained at the Ogden facility and at Red Giant Oil's main facility in Council Bluffs, IA (copies of which are available when requested by Utah DEQ). When truck is full, the driver returns to our terminal at 2785 Industrial Drive in Ogden, UT.

Upon arrival at the Red Giant terminal in Ogden, the truck is unloaded into one of the three 33,000 gallon day tanks. When that tank is determined to be ready to be sampled, it is locked down until representative samples can be collected and the results are received. A representative, composite sample of the oil in the tank is then collected for lab analysis for arsenic, cadmium, chromium, lead, flash point, water content, and total halogens. All lab samples are sent to a Utah DEQ approved lab. Certifications that the used oil meets the used oil fuel specification in R315-15-1.2 shall be made by a Utah-registered Used Oil Marketer.

If the tested product exceeds Red Giant's specifications for water contained in the oil but meets other chemical parameters maximum allowable limits (as outlined in R315-15-l.2, Table 1 and any applicable standards defined in 40 CFR 761.20(e)), Red Giant Oil will use heated coils filled with heat transfer oil in Tanks 2 or 3 to heat the product to 160 to 180 degrees F. This transfer oil is heated by a Gencor HY Way Heater (please note that Red Giant Oil has contacted the UDEQ Division of Air Quality and determined that a permit is not required for the Gencor HY Way Heater due to its intended emissions rate). When the oil reaches full temperature during heating process, an emulsion breaker is introduced at the prescribed application rate and the liquids are mixed using an in-tank mixer for a few minutes. The heat source is then removed and the oil is allowed to cool. When product is cooled to produce a separation phase, the resulting water is pumped from the tank bottom.

When the results of laboratory testing by a Utah-certified lab are received and parameters are determined by a Utah-registered Used Oil Marketer to meet the limits described in R315-15-l.2, Table 1, the lock on the tank valve is removed and the used oil is transferred to one of the two 51,000 gallon finish tanks. From there the finished product will be marketed to companies that burn the oil for energy recovery, or it will be sent off-site to be re-refined into a purified product, which is commonly called Number 5 used oil. All finished product will meet the definition of on specification fuel oil as described by R315-15-1.2 and R315-15-5, -6, and -7.

Used oil filters are collected by Red Giant Oil Ogden facility. They are picked up in a box truck in sealed DOT drums or in sealed dumpsters with lids. Used oil transporters are used to transport used oil filters. Drums and dumpsters are secured during transportation to prevent

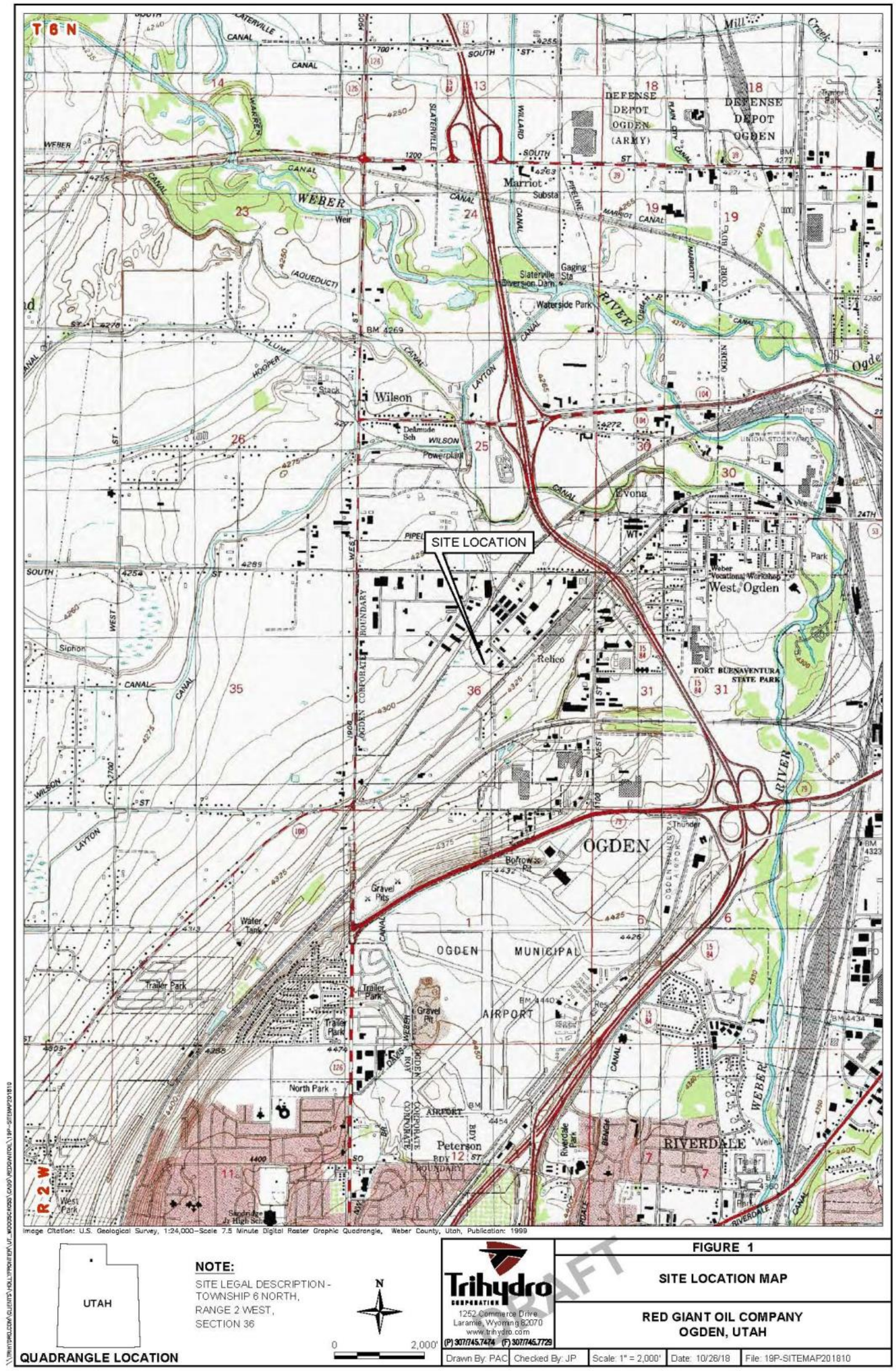
them from overturning and to prevent spillage within the truck of any oil that drains during transport. Once at the Ogden facility, used oil filters are transferred to 52 foot dry van trailers that are parked at the Ogden facility until they can be hauled to our Newcastle, Wyoming facility. All used oil filter containers and dry van trailers will be parked in a paved parking and storage area that is shown in the attached Figure 2. This is a paved area with a 5-inch high concrete curb to provide containment capacity for any leaks of oil from the used oil filter drums and trailers (secondary containment calculation for this area are provided in Section 4.0.). Once the filters and drums are at the Newcastle facility, the filters are drained and crushed into bricks for disposal. All residual oil from the filters is collected is put into our used oil stream for recycling at the Newcastle facility.

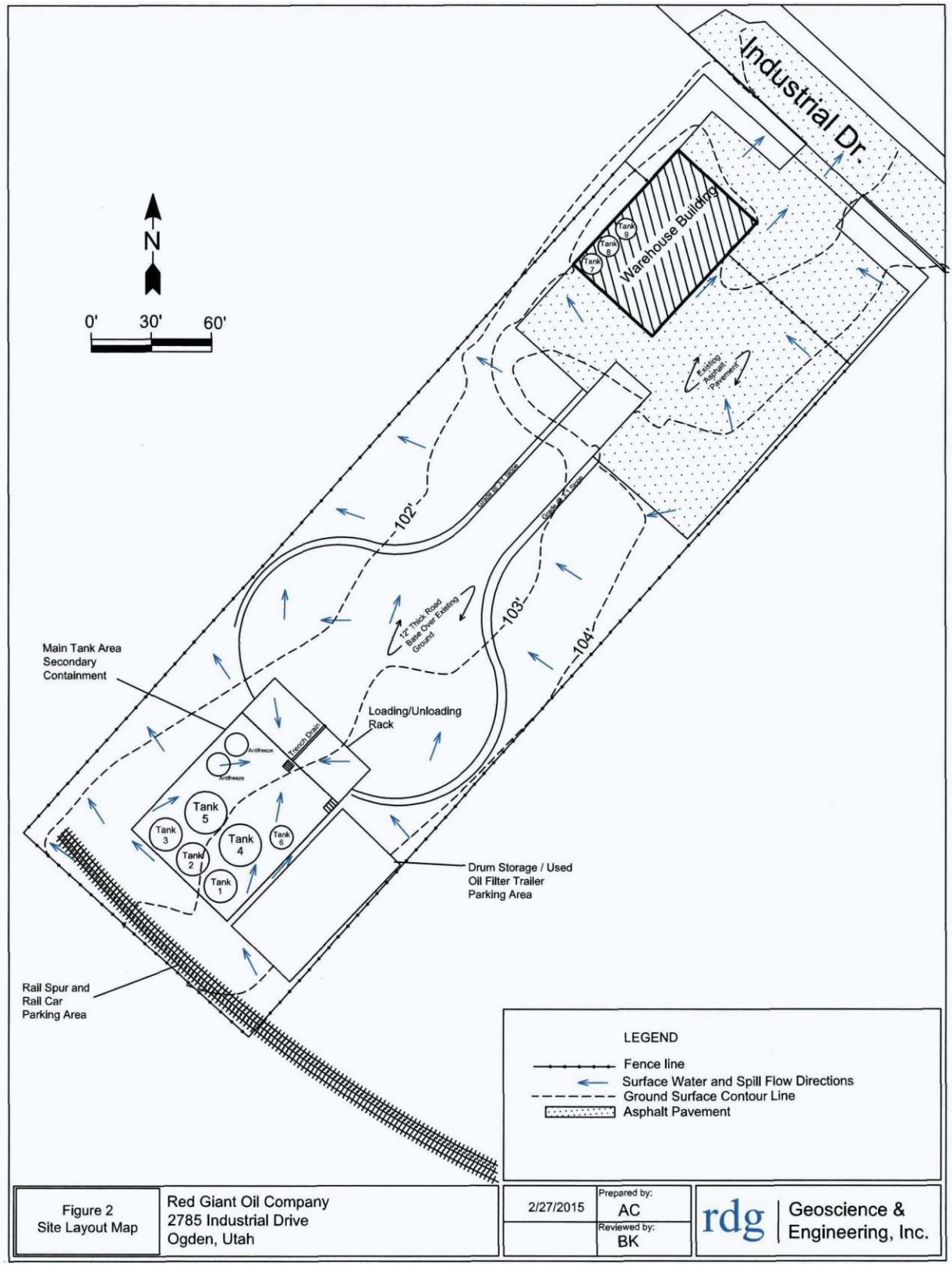
Oil soaked rags are collected at the Ogden facility and handled in a manner similar to used oil filters. They also are collected with our box truck and transferred to our 52 foot dry vans where they are hauled to our Newcastle, Wyoming facility. Upon arrival at the Newcastle facility, the rags are wrung out under high pressure to retrieve the oil. Residues are then sent out to be characterized and landfilled in accordance with State of Wyoming requirements.

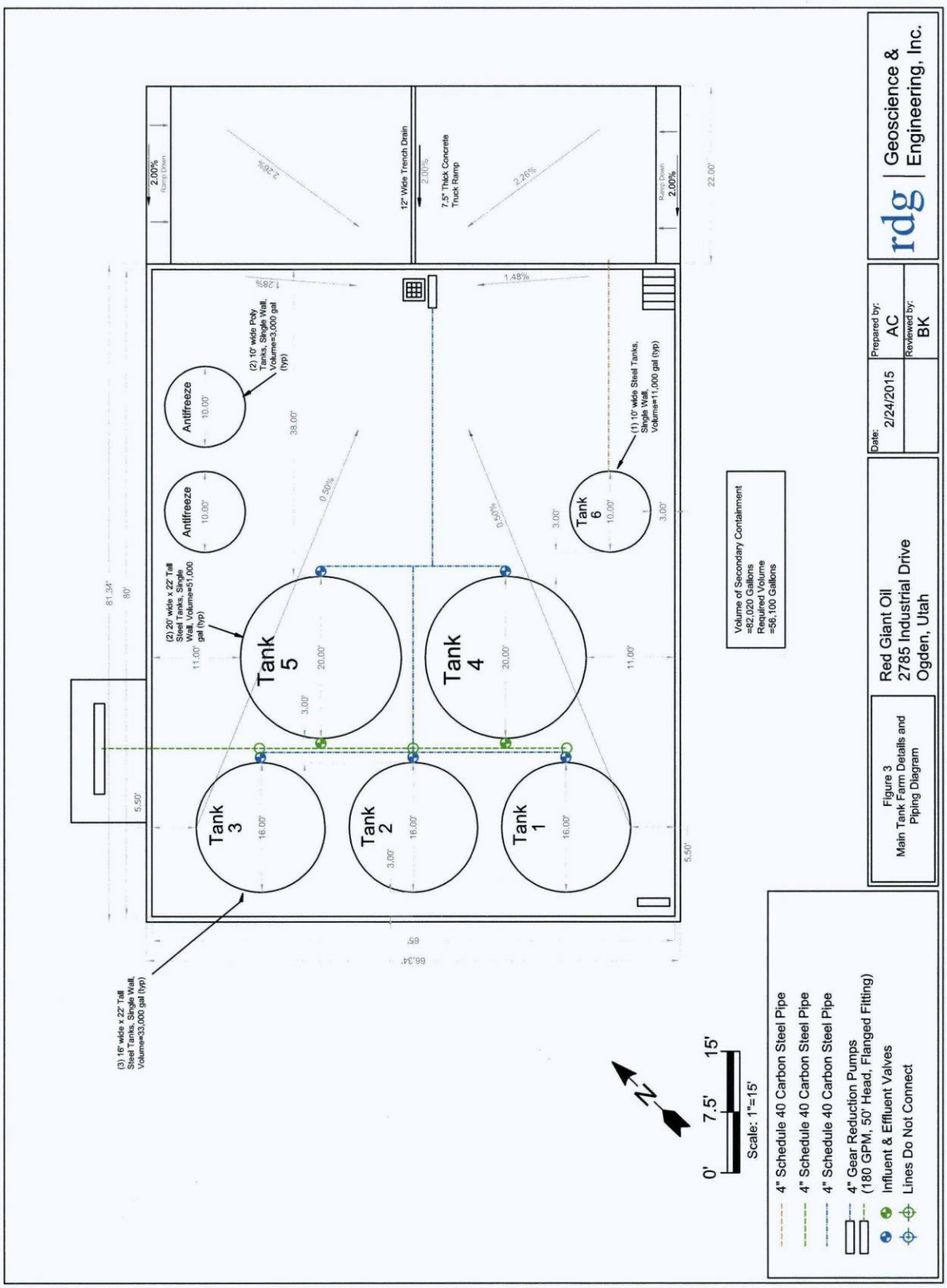
Other materials that may come in contact with used oil products during day to day operations at the facility; including shop rags, containers, or floor dry spill materials; are characterized for hazardous characteristics prior to being removed for any off-site disposal.

Used antifreeze will be collected by our collection trucks and by our box trucks. Prior to collecting antifreeze, Red Giant Oil requires customers to certify that the antifreeze is non-hazardous. If there is any generator information or other factors that suggest that the possibility that the antifreeze may be hazardous, it will be characterized to determine that is non-hazardous prior to any further processing as a recycled products. All antifreeze is sent out to third party recyclers for return to usefulness.

Steel I-beams are installed under each tank in the main tank farm to allow inspection of the tank bottom to check for leakage on a daily basis. All tanks will have sufficient sized and designed beams to safely hold the weight of each tank (See engineering certification in Section 10.0).


T 6 N
R 2 W
SITE LOCATION
DEFENSE DEPOT OGDEN (ARMY)
WEBER RIVER
Wilson
West Ogden
OGDEN
OGDEN MUNICIPAL AIRPORT
RIVERDALE
Peterson
Image Citation: U.S. Geological Survey, 1:24,000-Scale 7.5 Minute Digital Raster Graphic Quadrangle, Weber County, Utah, Publication: 1999
UTAH
QUADRANGLE LOCATION
NOTE:
SITE LEGAL DESCRIPTION - TOWNSHIP 6 NORTH, RANGE 2 WEST, SECTION 36
N
0
2,000'
Trihydro CORPORATION
1252 Commerce Drive
Laramie, Wyoming 82070
www.trihydro.com
(P) 307/745.7474 (F) 307/745.7729
FIGURE 1
SITE LOCATION MAP
RED GIANT OIL COMPANY
OGDEN, UTAH
Drawn By: PAC
Checked By: JP
Scale: 1" = 2,000'
Date: 10/26/18
File: 19P-SITEMAP201810
DRAFT


Industrial Dr.
N
0'
30'
60'
Warehouse Building
Tank 9
Tank 8
Tank 7
Existing Asphalt Pavement
102'
103'
104'
12" Thick Road Base Over Existing Ground
Main Tank Area Secondary Containment
Loading/Unloading Rack
Trench Drain
Antifreeze
Antifreeze
Tank 5
Tank 3
Tank 4
Tank 6
Tank 2
Tank 1
Drum Storage / Used Oil Filter Trailer Parking Area
Rail Spur and Rail Car Parking Area
LEGEND
Fence line
Surface Water and Spill Flow Directions
Ground Surface Contour Line
Asphalt Pavement
Figure 2
Site Layout Map
Red Giant Oil Company
2785 Industrial Drive
Ogden, Utah
2/27/2015
Prepared by:
AC
Reviewed by:
BK
rdg
Geoscience & Engineering, Inc.


Tank 1
Tank 2
Tank 3
Tank 4
Tank 5
Tank 6
Antifreeze
Antifreeze
(2) 10' wide Poly Tanks, Single Wall, Volume=3,000 gal (typ)
(2) 20' wide x 22' Tall Steel Tanks, Single Wall, Volume=51,000 gal (typ)
(3) 16' wide x 22' Tall Steel Tanks, Single Wall, Volume=33,000 gal (typ)
(1) 10' wide Steel Tanks, Single Wall, Volume=11,000 gal (typ)
12" Wide Trench Drain
7.5" Thick Concrete Truck Ramp
2.00% Ramp Down
Volume of Secondary Containment
=82,020 Gallons
Required Volume
=56,100 Gallons
Figure 3
Main Tank Farm Details and Piping Diagram
Red Giant Oil
2785 Industrial Drive
Ogden, Utah
Date: 2/24/2015
Prepared by: AC
Reviewed by: BK
rdg Geoscience & Engineering, Inc.
Scale: 1"=15'
0' 7.5' 15'
4" Schedule 40 Carbon Steel Pipe
4" Schedule 40 Carbon Steel Pipe
4" Schedule 40 Carbon Steel Pipe
4" Gear Reduction Pumps (180 GPM, 50' Head, Flanged Fitting)
Influent & Effluent Valves
Lines Do Not Connect

4.0 Containment & Storage

The quantities of estimated new and used lube oil and other oils that will be stored and/or processed at the facility are summarized in the table below. Secondary containment calculations for the Main Tank Farm and Warehouse areas are also attached on the following pages.

Oil is stored in fixed containers and in portable and/or mobile containers as is listed below.

Fixed Oil Holding Tanks (Located Inside Main Tank Farm Containment)

Tank ID	Capacity (gallons)	Contents	Tank Construction
1	33,000	Used Oil	Steel
2	33,000	Used Oil	Steel
3	33,000	Used Oil	Steel
4	51,000	Used Oil	Steel
5	51,000	Used Oil	Steel
6	11,000	Used Oil or Diesel Fuel	Steel

Note: Estimated spill holding capacity of Main Tank Farm secondary containment area is 76,700 gallons accounting for displacement and freeboard precipitation. Secondary containment calculations and assumptions are included on the following page.

Portable and Temporary Location Oil Holding Tanks

Tank ID	Capacity (gallons)	Service	Tank Construction
Railcars (up to 2)	50,000 (assumes 2 cars at maximum of 25,000 each, this is the largest railcar volume anticipated by Red Giant Oil)	Used oil and/or new lube oil	Steel
Drums, Totes	4,000	Used oil and/or new lube oil	Steel/ Polyethylene
Oil filter drums and trailers	1,000	Used oil in undrained filters that are awaiting off-site transport	Steel
Tanker Vehicles	10,000	Used oil awaiting off-loading or off-site transport	Steel

Fixed Oil Holding Tanks (Located Inside Warehouse Building)

Tank ID	Capacity (gallons)	Service	Tank Construction
7	6,800	New lube oil	Steel
8	6,800	New lube oil	Steel
9	6,800	New lube oil	Steel

Total Estimated Maximum Volume All Oil = 297,400 gallons

Total Estimated Maximum Volume Used Oil Products= 277,000 gallons

Attachment 2
Used Oil Analysis Plan

Prior to accepting used oil or oily water subject to R315-15 from a used oil transporter, the Permittee shall screen or require the transporter to screen the incoming used oil using the following:

1. For oil containing less than 20% water, use CLOR-D-TECT ® halogen test kit (EPA Method 9077).

2. For oil containing between 20 and 70% water, use HYDROCLOR-Q ® test kit but correct the result using a conversion as follows:

$$\text{True Halogen Concentration} = \text{Syringe Reading} \times \frac{(10 + \text{ml oil in sample})}{10}$$

   For example, if the sample contained 6 ml water and 4 ml oil (i.e. 60% water) and the reading off the syringe was 2000 ppm, then the true concentration would be:

   (2000 ppm) × [(10 + 4)/10] = 2800 ppm

3. For oil containing more than 70% water, use HYDROCLOR-Q ® test kit without correction.

Used Oil is currently not being accepted at the facility and the Permittee is not making the determination that used oil meets the used oil fuel specification in R315-15-1.2. If such a certification should be required, it shall be made by a Utah-registered Used Oil Marketer.

Attachment 3
Spill and Contingency Plan

9.0 Contingency Plan

9.1 Purpose

The purpose of this Contingency Plan is to describe measures implemented by Red Giant Oil (formerly Tristate Recycling Services, Inc.) to prevent oil discharges from occurring, and to prepare Red Giant Oil to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge. The provisions of this plan shall be carried out immediately whenever there is a fire, explosion, or release of used oil which could threaten human health or the environment.

This Contingency Plan will also be used as a reference for oil storage information and testing records, as a tool to communicate practices on preventing and responding to discharges with employees, as a guide to facility inspections, and as a resource during emergency response.

The Used Oil Processing facility located at 2785 Industrial Road, Ogden, UT is inactive. Tanks identified in this permit are not and have not been utilized for used oil management. No oil filters are currently stored at the facility. Because the tanks at the facility do not contain used oil and oil filters are no longer stored, there is no risk of a release, fire or explosion of used oil. This Contingency Plan is, therefore, prospective only in the event that used oil is managed at the facility in the future.

9.2 Approval and Designated Person

Red Giant Oil is committed to preventing discharges of oil to navigable waters and the environment, and maintaining the highest standards for spill prevention control and countermeasures through the implementation and regular review and amendment to this Plan. This Contingency Plan has the full approval of Red Giant Oil management. Red Giant Oil has committed the necessary resources to implement the measures described in this Plan.

The Facility Manager is the Designated Person Accountable for Oil Spill Prevention at the facility and has the authority to commit the necessary resources to implement this Plan.

9.3 Facility Location and Activities

Red Giant Oil collects used oil from a variety, of sources and provides used oil to businesses as a source of fuel in oil-burning heaters. In addition, Red Giant Oil provides used oil to re-refineries and as fuel for asphalt hot plants to burn to heat the asphalt mix. Red Giant Oil Recycling also distributes a variety of new, unused petroleum oils, such as hydraulic oil, motor oil and/or transmission fluid, primarily to commercial customers.

Red Giant Oil receives used oil in tanker trucks. The used oil shall be stored in five aboveground storage tanks (ASTs). New oil products are stored in 55-gallon drums and the drums are stored inside a small warehouse. New oil products are received from commercial vendors and delivered via truck. All oil, new and used, are delivered to customers by Red Giant Oil trucks or by independent contractors.

Small quantities of used oil may also enter the facility in oil filters that are stored on site in trailers prior to off-site shipment for final processing. Once at the Ogden facility, used oil filters contained in drums shall be transferred to 52 foot dry van trailers. The trailers will be parked on a paved area with secondary containment that is parked at the Ogden facility until they can be hauled to our Newcastle, Wyoming facility. The location for parking of trailers with used oil filters drums is shown in the attached Figure 2. This is a paved area with a 5-inch high concrete curb to provide containment capacity for any leaks of oil from the used oil filter drums and trailers (secondary containment calculation for this area are provided in Section 4.0.). Once the filters and drums are at the Newcastle facility, the filters are drained and crushed into bricks for processing. All residual oil from the filters is collected is put into our used oil stream for recycling at the Newcastle facility.

Red Giant Oil is located at 2785 North Industrial Drive, Ogden, Utah. Hours of operation are between 8:00 AM and 5:00 PM, Monday through Friday. For the purpose of loading or unloading oil products, facility personnel have access to the area during closed hours. Personnel at the facility include a Facility Manager, three truck drivers, and a customer service representative.

The facility diagram included in Attachment 9-A shows the location of bulk oil storage containers, buildings, the rail spur where tanker cars may be located, and the loading/unloading and transfer areas.

Red Giant Oil is located in a primarily commercial area at 2785 Industrial Road, Ogden, Utah. The City of Ogden considers the zoning for the area as Ogden Commercial and Industrial Park (OCIP). The site is comprised of approximately 1.66 acres of land and is bordered to the north by Industrial Drive, to the west by Geneva Rock office/warehouse complex, to the east by an empty warehouse and storage yard, and to the south by a railroad spur line and right-of-way.

The site includes an office building, which also serves as a storage area for new oil products, a maintenance shop, a tanker truck unloading area, and product storage and handling areas. Oil products are stored in bulk storage tanks within the main bulk storage area, and inside the office/storage building.

9.4 Oil Storage

Oil storage at the facility is at fixed location tanks and portable tanks and containers. In addition, the facility stores a varying stock of new oil drums inside the maintenance/office building.

The capacities of oil containers present at the site are listed below. All containers with the capacity of 55 gallons or more are included in the facility volume calculation. Vehicles with oil will not be parked at locations for more than 24 hours, so their volume is also not included with the facility volume calculation.

Fixed Oil Holding Tanks (Located Inside Main Tank Farm Containment)

Tank ID	Capacity (gallons)	Contents	Tank Construction
1	33,000	Used Oil	Steel
2	33,000	Used Oil	Steel
3	33,000	Used Oil	Steel
4	51,000	Used Oil	Steel
5	51,000	Used Oil	Steel
6	11,000	Used Oil or Diesel Fuel	Steel

Note: Estimated spill holding capacity of Main Tank Farm secondary containment area is calculated to be 83,000 gallons which considers displacement and precipitation freeboard. Secondary containment calculations are included in Section 4.0 of this permit application.

Fixed Oil Holding Tanks (Located Inside Warehouse Building)

Tank ID	Capacity (gallons)	Contents	Tank Construction
7	6,800	New lube oil	Steel
8	6,800	New lube oil	Steel
9	6,800	New lube oil	Steel

Note: Estimated spill holding capacity of Warehouse Building Interior floor with 4-inch high concrete containment curb is 8,975 gallons which considers displacement. Secondary containment calculations are included in Section 4.0 of this permit application.

Portable and Temporary Location Oil Holding Tanks

Tank ID	Capacity (gallons)	Service	Tank Construction
Railcars (up to 2)	50,000	Used oil and/or New lube oil	Steel
Drums, Totes	4,000	New and/or used lube oil	Steel/Polyethylene
Drums and Trailers with Used Oil Filters	1,000	Undrained used oil filters at facility awaiting off-site processing	Steel
Tanker Trucks	10,000	Used oil prior to off-loading or off-site transport	Steel

Total Oil Storage: 297,400 gallons
Total Used Oil Storage: 277,000 gallons

9.5 Evaluation of Discharge Potential

Distance to Navigable Waters and Adjoining Shorelines and Flow Paths

The facility is located on relatively level terrain. Drainage generally flows towards the north and onto North Industrial Drive. There is a single storm water catch basin located approximately 400 feet west of the subject property. The location of the catch basin is across Industrial Drive and then west down the concrete gutter to where Industrial Drive bends to the north. The catch basin is located at the bend in the road. The storm water system ultimately discharges into the Weber River, which is considered a tributary to a navigable waterway. In order to reach the Ogden River, any contamination entering the catch basin would first be discharged to the Clayton Canal. The Clayton Canal discharges irrigation and storm water into the Weber River. The Weber River is approximately 1.25 miles northeast of the subject property. There are no storm water drains on the subject property.

Approximately 25% of the facility's ground surface area is covered with the office/warehouse building and asphalt paving. The remainder consists of compacted gravel, grass, and low-lying vegetation.

Oil Discharge History

Description of Discharge	Corrective Actions Taken	Plan for Preventing Recurrence
Approximately 100 gallons of used oil was released during transfer between two vehicles on 9/23/2014 (the receiving vehicle was overfilled).	Oil was released onto gravel filled parking area and contaminated soils were removed.	Improved training for staff involved with oil transfers.

9.6 Discharge Prevention

The following measures are implemented to prevent oil discharges during the handling, use, or transfer of oil products at the facility. Oil-handling employees have received training in the proper implementation of these measures.

9.7 Compliance with Applicable Requirements

Non-destructive integrity evaluation is not performed on the 55-gallon storage drums or other portable totes used to store new or used lube oil.

Tank numbers 1-9 are single-walled steel tank. The tanks shall be inspected and/or tested on a regular basis and/or whenever material changes are made to the tanks (See Section 9.19 for testing schedule). All inspection and/or testing shall be in compliance with 40 CFR Part 112.8(c)(6). Inspections shall be completed by qualified personnel of Red Giant Oil or outside contractors. Information collected during inspections shall be based on STI SP001 5th Edition AST Record, Monthly, and Annual checklists. Records of inspections and tests shall be maintained on site and shall be made available to personnel from UDEQ if requested.

Storage drums and totes may be stored inside of the warehouse or on the concrete containment pad (See Figure 2 in Section 3.0). Any leaks would be visible to facility personnel and would be contained on concrete. Corrosion poses minimal risk of failure, since drums are single-use and remain on site for a relatively short period of time (less than one year).

9.10 Facility Layout Diagram

Figure 1 in Section 3.0 shows the general location of the facility on a U.S. Geological Survey topographic map. Figure 2 in Section 3.0 shows a layout of the facility, including the main containment berm, warehouse, and paved drum storage and truck parking area. Figure 2 also shows the direction of surface water runoff. Figure 3 of Section 3.0 is a facility diagram that shows the location and content of ASTs, the loading and unloading area, and associated transfer piping.

9.11 Spill Reporting

The discharge notification form included in Appendix 9-E will be completed upon immediate detection of a discharge and prior to reporting a spill to the proper notification contacts.

9.12 Potential Discharge Volumes and Direction of Flow

Table 9-1 presents expected volume, discharge rate, general direction of flow in the event of equipment failure, and means of secondary containment for different areas of the facility where oil is stored, used, or handled.

Table 9-1
Potential Discharge Volumes and Direction of Flow

Potential Event	Maximum volume released (gallons)	Maximum discharge rate	Direction of Flow	Secondary Containment
Bulk Oil Storage Areas (Aboveground Storage Tanks #1-9)				
Failure of aboveground tank (collapse or puncture below product level)	Up to 51,000	Gradual to instantaneous	Release would be fully contained in secondary containment	Main Concrete Secondary Containment for Tanks 1-6, Warehouse Floor Containment for Tanks 7-9
Tank overfill	Up to 120	60 gal/min	Release would be fully contained in secondary containment	Main Concrete Secondary Containment for Tanks 1-6, Warehouse Floor Containment for Tanks 7-9
Pipe Failure	51,000 (all bottom piping on tanks have check valve to prevent all oil from being released)	240 gal/min	Release would be fully contained in secondary containment	Main Concrete Secondary Containment
Loading Rack/Unloading Area				
Tank truck leak of failure inside the loading/unloading area	1 to 7000	Gradual to instantaneous	Release would be fully contained in secondary containment	Loading/unloading containment into main secondary containment
Hose leak during truck loading	1 to 7000	60 gal/min	Release would be fully contained in secondary containment	Loading/unloading containment into main secondary containment
Rail Cars				
Leak or release from tank	Up to 25,000 per tank car	Gradual to instantaneous	Release would enter railcar secondary containment, and then flow into main secondary containment.	Railcar containment into main secondary containment
Hose leak during transfers	1 to 1000	60 gal/min	Spills would be contained on railcar secondary containment, and then flow into main secondary containment.	Loading/unloading containment into main secondary containment
Office/Warehouse Building				
Leak or failure of drum or tank.	Up to 6,800 gallons for rupture of largest tank. Up to 300 gallons for rupture or leak from drum or tote container.	Gradual to instantaneous	Leak or Release would be contained by concrete containment curb that is pending construction by Red Giant Oil.	Spill pallets for leaks or spills from drums and totes. The building wall and curbs placed and door will also prevent any spilled oil from exiting. (Note that this placement of the curbs at doors is pending construction at the time of this report).

9.12 Containment and Diversionary Structures

Methods of secondary containment at this facility consist of constructed secondary containment structures and active containment methods and procedures that are described below:

- **Concrete Secondary Containment.** A concrete secondary containment structure is constructed around the largest ASTs (Tanks 1 through 6). The calculated secondary containment of the concrete dike is 83,000 gallons (see calculations in Section 4.0), which is greater than 110% of the capacity of the largest tank. Engineer's certification for the construction of this structure is provided in Section 10.0.

- **Building Walls and Containment Curb Around Warehouse Perimeter.** A spill inside of the facility warehouse would be contained by the building walls and a 4-inch high concrete containment will be constructed by Red Giant Oil around the perimeter of the warehouse building to prevent any spilled materials from exiting the building. With the 4-inch curb, the estimated containment capacity is 8,974 gallons (see calculations in Section 4.0). Note that a minimum curb height of 3.5-inches would be necessary to provide adequate containment.

- **Loading/unloading dike.** The loading/unloading area consists of an open ended concrete ramp with a trench drain in the middle. The floor of the driveway is sloped 0.51 percent from each end toward the center trench drain as well, because the entire floor is sloped 2.0 percent towards the AST containment area. The trench drain is 12 inches wide and 24 inches deep and discharges into the AST containment area by means of a 6-inch pipe that extends into the containment area approximately 2 inches below the top of the southeast AST containment wall. Any spilled oil products are directed to the trench drain and into the main AST containment area. The containment for the unloading/loading area is sufficiently large enough for the largest compartment of the transport vehicle.

- **Railcar Containment.** Containments are installed in areas where railcars are parked and loaded and/or unloaded. The railcar containments are piped to gravity drain into the main containment berm.

- **Active Containment Materials.** Spill cleanup kits that include absorbent material, booms, and other portable barriers are located inside the office/warehouse building near the drummed oil storage area and adjacent to the secondary containment for the

ASTs in a weatherproof container. The spill kits are located within close proximity of the oil product storage and handling areas for rapid deployment should a spill occur. This should allow for quick deployment in the event of a discharge during loading/unloading activities or any other accidental discharge outside the dike or loading/unloading area, such as from tank vehicles entering/leaving the facility. The response equipment inventory for the facility is listed in Appendix 9-F of this Plan. The inventory is checked monthly to ensure that used material is replenished.

Practicability of Secondary Containment

Red Giant Oil management has determined that secondary containment is practicable at this facility.

9.13 Inspections, Tests, and Records

Daily Inspections

A Red Giant Oil employee performs a complete walk-through of the facility each day. This daily visual inspection involves looking for tank/piping damage or leakage, stained or discolored soils, or excessive accumulation of water in containment areas.

Monthly Inspection

The checklist provided at the end of this section is used for monthly inspections by Red Giant Oil. The monthly inspections cover the following key elements:

- Observing the exterior of aboveground storage tanks, pipes, and other equipment for signs of deterioration, leaks, corrosion, and thinning.
- Observing the exterior of portable containers for signs of deterioration or leaks.
- Observing tank foundations and supports for signs of instability or excessive settlement.
- Observing the tank fill and discharge pipes for signs of poor connection that could cause a discharge, and the tank vent for obstructions and proper operation.
- Verifying the proper functioning of overfill prevention systems.
- Checking the inventory of discharge response equipment and-restocking as needed.

All problems regarding tanks, piping, containment, or response equipment must immediately be reported to the Facility Manager. Visible oil leaks from tank walls, piping, or other components must be repaired as soon as possible to prevent a larger spill or a discharge to navigable waters or adjoining shorelines. Pooled oil is removed and properly disposed immediately upon discovery.

Written monthly inspection records are maintained for a period of three years.

Annual Inspection

Facility personnel perform a more thorough inspection of facility equipment on an annual basis. This annual inspection complements the monthly inspection described above and is performed in April of each year using the checklist provided at the end of this section.

The annual inspection is preferably performed following a large storm event in order to verify the imperviousness and/or proper functioning of drainage control systems such as the dike.

Written annual inspection records are maintained for a period of three years.

Periodic Integrity Testing

In addition to the above monthly and annual inspections by facility personnel, Tank numbers 1-6 are periodically evaluated by an outside certified tank inspector following the Steel Tank Institute (STI) Standard for the Inspection of Aboveground Storage Tanks, SP-00 1, 2005 version.

9.14 Personnel, Training, and Discharge Prevention Procedures (40 CFR 112.7(F))

Red Giant Oil management is the facility designee and is responsible for oil discharge prevention, control, and response preparedness activities at this facility.

Red Giant Oil Recycling management has instructed oil-handling facility personnel in the operation and maintenance of oil pollution prevention equipment, discharge procedure protocols, applicable pollution control laws, rules and regulations, general facility operations, and the content of this Contingency Plan. Any new facility personnel with oil-handling responsibilities are provided with this same training prior to being involved in any oil operation.

Annual discharge prevention briefings are held by the Facility Manager for all facility personnel involved in oil operations. The briefings are aimed at ensuring continued understanding and adherence to the discharge prevention procedures presented in the Contingency Plan. The briefings also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Facility operators and other personnel will have the opportunity during the briefings to share recommendations concerning hea1th, safety, and environmental issues encountered during facility operations.

Records of the briefings discharge prevention training are kept on file for a period of three years.

9.15 Security

An 8-ft tall steel security fencing surrounds the majority of the facility (with the exception of where railcars enter and leave). All valves on railcars are kept locked except during loading or unloading. The single entrance gate is locked when the facility is unattended.

Area lights illuminate the loading/unloading and storage areas. The lights are placed to allow for the discovery of discharges and to deter acts of vandalism.

The facility securely caps or blank-flanges the loading/unloading connections of facility piping when not in service or when in standby service for an extended period of time, or when piping is emptied of liquid content either by draining or by inert gas pressure.

9.16 Tank Truck Loading/Unloading Rack Requirements

The potential for discharges during tank truck loading and unloading operations is of particular concern at this facility. Red Giant Oil Recycling management is committed to ensuring the safe transfer of material to and from storage tanks. The procedures identified below are implemented to prevent oil discharges during tank truck loading and unloading operations.

Secondary Containment

The facility has a loading/unloading area where product, including used oil, is unloaded from large capacity tanker trucks to the facility's bulk storage tanks and loaded to smaller capacity tanker trucks for delivery to the end-user. This same loading/unloading area may be used by outside suppliers making deliveries to the facility, as well as to load delivery trucks.

The tank truck loading/unloading area has a secondary containment that is designed to capture spills and drain them into the main containment structure.

Although delivery trucks are usually empty while at the site, Red Giant Oil personnel may periodically park overnight one of its tank trucks while full if the truck cannot be unloaded during a regular work day. If it is necessary to park a loaded vehicle for more than 24 hours, it will be parked on the main loading rack or in the paved containment are located adjacent to the main secondary containment.

Loading/Unloading Procedures

All suppliers must meet the minimum requirements and regulations for tank truck loading/unloading established by the U.S. Department of Transportation. Red Giant Oil Recycling ensures that the vendor understands the site layout, knows the protocol for entering the facility and unloading product, and has the necessary equipment to respond to a discharge from the vehicle or product delivery hose.

The Facility Manager or his/her designee supervises oil deliveries for all new suppliers and periodically observes deliveries for existing, approved suppliers.

All loading and unloading of tank vehicles takes place only in the designated loading /unloading area.

Vehicle filling operations are performed by facility personnel trained in proper discharge prevention procedures. The truck driver or facility personnel remain with the vehicle at all times while product is being transferred. Transfer operations are performed according to the minimum procedures outlined in table below.

Fuel Transfer Procedures (Trucks Only)

Stage	Tasks
Prior to loading/ unloading	○ Visually check all hoses for leaks and wet spots. ○ Verify that sufficient volume (ullage) is available in the storage tank or truck. ○ Secure the tank vehicle with wheel chocks and interlocks. ○ Ensure that the vehicle's parking brakes are set. ○ Verify proper alignment of valves and proper functioning of the pumping system ○ If filling a tank truck, inspect the lowermost drain and all outlets. ○ Turn off cell phone.
During loading & unloading	○ Driver must stay with the vehicle at all times during loading/unloading activities. ○ Periodically inspect all systems, hoses and connections. ○ When loading, keep internal and external valves on the receiving tank open along with the pressure relief valves. ○ When making a connection, shut off the vehicle engine. ○ Maintain communication with the pumping and receiving stations. ○ Monitor the liquid level in the receiving tank to prevent overflow. ○ Monitor flow meters to determine rate of flow. ○ When topping off the tank, reduce flow rate to prevent overflow.
After loading/ unloading	○ Make sure the transfer operation is completed. ○ Close all tank and loading valves before disconnecting. ○ Securely close all vehicle internal, external, and dome cover valves before disconnecting. ○ Secure all hatches. ○ Disconnect grounding/bonding wires. ○ Make sure the hoses are drained to remove the remaining oil before moving them away from the connection. Use a drip pan. ○ Cap the end of the hose and other connecting devices before moving them to prevent uncontrolled leakage. ○ Remove wheel chocks and interlocks. ○ Inspect the lowermost drain and all outlets on tank truck prior to departure. If necessary, tighten, adjust, or replace caps, valves, or other equipment to prevent oil leaking while in transit.

9.17 Brittle Fracture Evaluation

Tanks 1 through 5 are field constructed tanks while tanks 5 through 8 are shop constructed tanks. The shell thickness of all tanks is less than one-half-inch. As discussed in the American Petroleum Institute (API) Standard 653 Tank Inspection, Repair, Alteration, and Reconstruction (API-653), brittle fracture is not a concern for tanks that have a shell thickness of less than one-half inch. This is the extent of the brittle fracture evaluation for this tank.

Nonetheless, in the event that any tank undergoes a repair, alteration, reconstruction, or change in service that might affect the risk of a discharge or failure, the container will be evaluated for risk of discharge or failure, following API-653 or an equivalent approach, and corrective action will be taken as necessary.

9.18 Conformance with State and Local Applicable Requirement

All bulk storage tanks at this facility are in compliance with local and state regulations and are adequately labeled as containing Used Oil.

Additionally, Red Giant Oil acknowledges and attests to complying with the conditions specified in Utah Administrative Code R315-15-9. Engineer's certifications for tank, piping, and secondary containments are provided in Section 10.0.

9.19 Discharge Prevention – Provisions for Onshore Facilities

Facility Drainage

Rain and snowmelt inside the concrete dike surrounding Tanks 1-6 are directed to the catch basin/junction box located adjacent to the east wall of the secondary containment structure. There is no outlet to this containment; therefore, any liquid that accumulates in the basin must be pumped out for disposal. Water that is pumped from the secondary containment area will be transferred into tanks that are used to store process water prior to its characterization and off-site disposal at appropriate water disposal facilities.

Bulk Storage Containers

The table below summarizes the construction, volume, and content of bulk storage containers at the Red Giant Oil facility.

List of Oil Containers

Tank ID	Location	Type	Construction Material	Discharge Prevention Method and Containment
1	Main Containment Structure	AST Vertical	Steel, Field Erected	Concrete Containment and liquid level gauge and alarm
2	Main Containment Structure	AST Vertical	Steel, Field Erected	Concrete Containment and liquid level gauge and alarm
3	Main Containment Structure	AST Vertical	Steel, Field Erected	Concrete Containment and liquid level gauge and alarm
4	Main Containment Structure	AST Vertical	Steel, Field Erected	Concrete Containment and liquid level gauge and alarm
5	Main Containment Structure	AST Vertical	Steel, Field Erected	Concrete Containment and liquid level gauge and alarm
6	Main Containment Structure	AST Vertical	Steel, Shop Erected	Concrete Containment and liquid level gauge and alarm
7	Main Containment Structure	AST Vertical	Steel, Shop Erected	Walls Around Warehouse Perimeter, Flow Prevention Lip at Door, Liquid level gauge.
8	Warehouse Bldg.	AST Vertical	Steel, Shop Erected	Walls Around Warehouse Perimeter, Flow Prevention Lip at Door, Liquid level gauge.
9	Warehouse Bldg.	AST Vertical	Steel, Shop Erected	Walls Around Warehouse Perimeter, Flow Prevention Lip at Door, Liquid level gauge.
Railcars	On Railspur	Tank on Railcar	Steel	Secondary Containment on tracks that is piped into main concrete containment berm.
Drums and Totes	Warehouse Bldg.	300 gallon totes or 55 gallon drums	Steel or plastic.	Building also has curbs which serve as containment as there are no floor drains in building.
Tanker Trucks	Parked on loading racks	Up to 10,000 gallons	Steel	Trucks are parked on loading racks or in trailer parking area with secondary containment,

Construction

All fixed oil tanks used at this facility are constructed of steel, in accordance with industry specifications as described above. The design and construction of all bulk storage containers are

compatible with the characteristics of the oil product they contain, and with temperature and pressure conditions. Drums and totes may be constructed of steel or polyethylene.

Piping between fixed aboveground bulk storage tanks is made of steel and placed aboveground on appropriate supports designed to minimize erosion and stress.

Secondary Containment

A concrete secondary containment is provided around Tanks 1-6. Tanks 4 and 5 each have a 51,000-gallon capacity. Tanks 1, 2, and 3 each have a capacity of 33,000 gallons, while Tank 6 has an 11,000 gallon capacity. Up to three tanks containing used antifreeze may also be kept inside of the concrete containment dike. Although these tanks are not included with the total volume calculations of the amounts of oil kept at the facility, there are accounted for in calculations for the total containment volume of the secondary containment.

Secondary containment calculations are included in Section 4.0. Accounting for displacement and precipitation free board (a 4-inch rainfall which is greater than amount of a 25-year, 24-hour storm event for this region of Utah), the containment volume for the main tank farm is estimated to have a total available capacity of 83,000 gallons. This amount is greater than 110% of the capacity of the largest single tank that is located inside of the containment berm.

The concrete dike was built under the supervision of a structural engineer and in conformance with specifications to be impervious to oil for a period of 72 hours. (Note that Engineers certifications for the secondary containment and for the tanks and piping are included in Section 10). The facility is unattended for a maximum of 62 hours (Friday evening through Monday morning) and therefore any spill into the diked area would be detected before it could escape the diked area. The surfaces of the concrete floor and the inside of the walls, along with the interface of the floor and walls, are visually inspected during the monthly facility inspection to detect any crack, signs of heaving or settlement or other structural damage that could affect the ability of the dike to contain oil. Any damage is promptly corrected to prevent migration of oil into the ground or out of the dike.

There are three (3), 6,800 gallons tanks used to store new lube oil that are located inside of the warehouse building. A 4-inch containment curb will be constructed at doors around the perimeter of the warehouse building to contain any sudden large releases from these tanks and to prevent the releases from leaving the building. Secondary containment calculations are included in Section 4.0. Accounting for displacement, the curb containment is estimated to have a total available spill holding capacity of 8,970 gallons. This amount is greater than 110% of the capacity of the largest single tank that is located inside of the warehouse building. This secondary containment volume is also intended to contain any released from drums that are stored inside of the warehouse.

Drainage of Diked Area

The concrete secondary containment area for the main tank farm is pumped under the direct supervision of facility personnel. Water that is pumped from the secondary containment area will be transferred into tanks that are used to store process water prior to its characterization and off-site disposal at appropriate water disposal facilities.

Corrosion Protection

This section is not applicable since there are no partially buried or bunkered storage tanks at this facility.

Inspections and Tests (40 CFR 112.8(c)(6))

Visual inspections of ASTs by facility personnel are performed according to the procedure described in this Contingency Plan. Leaks from tank seams, gaskets, rivets, and bolts are promptly corrected. Records of inspections and tests are signed by the inspector and kept at the facility for at least three years.

The scope and schedule of certified inspections and tests performed on the facility's ASTs are specified in STI Standard SP-001. The external inspection includes ultrasonic testing of the shell, as specified in the standard, or if recommended by the certified tank inspector to assess the integrity of the tank for continued oil storage.

Records of certified tank inspections are kept at the facility for at least three years. Shell test comparison records are retained for the life of the tanks.

Scope and Frequency of Bulk Storage Containers Inspections and Testing

Inspection/Test	Tanks 1 though 5	Tanks 6 though 9	Drums/Portable Containers
Visual inspection by facility personnel (as per checklist of Appendix C)	Monthly	Monthly	Monthly
External inspection by certified inspector (as per STI Standard SP-001)	Every 5 years	Every 5 years	Not applicable
Internal inspection by certified inspector (as per STI Standard SP-001)	Every 10 years or as recommended by a certified Inspector based on findings from internal inspections	Every 20 years or as recommended by a certified Inspector based on findings from internal inspections	Not applicable

The frequency above is based on the implementation of a scheduled Inspection/Testing Program. To initiate, the program, ASTs will be internally inspected by the following dates:

- Tank #1-5: external inspection to be performed by August 31, 2022
- Tank #6-9: external inspection to be performed by August 31, 2032

Overfill Prevention Systems

All tanks are equipped with a direct-reading level gauge and an audible high-level alarm system. The 55-gallon storage drums are not refilled, and, therefore, overfill prevention systems do not apply.

Facility personnel are present throughout the filling operations to monitor the product level in the tanks.

Visible Discharges

Visible discharges from any container or appurtenance — including seams, gaskets, piping, pumps, valves, rivets, and bolts — are quickly corrected upon discovery.

Oil is promptly removed from the diked area and disposed of according to the waste disposal method described later under "Discharge Response."

Mobile and Portable Containers

Small portable used oil storage containers**,** such as 55-gallon drums, are stored inside the warehouse building or on the asphalt containment pad that is located adjacent to the main AST containment area.

Red Giant Oil delivery trucks generally return to the facility empty and are returned to inventory. Whenever they remain at the facility, while full for an extended period of time (such as when parking overnight or when a load arrives that cannot be unloading during the same work day), the trucks are positioned in the loading/unloading area or on the paved containment area located adjacent to the main AST secondary containment area. Secondary containment calculations for both of these areas are included in Section 4.0

9.20 Transfer Operations, Pumping, and In-Plant Processes

Transfer operations at this facility include:

- The transfer of oil into or from tanker trucks occurs only at the loading /unloading area. This transfer operation is either from tank trucks into one of five ASTs or from the ASTs to a tanker truck.

All transfer piping is above ground and constructed of steel. Flexible hoses are used to connect the tank trucks to the AST transfer piping. All aboveground piping and valves are examined monthly to assess their condition. Inspection includes aboveground valves, piping, appurtenances, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces. Observations are noted on the monthly inspection checklist provided in this Plan.

Lines that are not in service or are on standby for an extended period of time are capped. All pipe supports are designed to minimize abrasion and corrosion and allow for expansion and contraction. Pipe supports are visually examined during the monthly inspection of the facility.

Warning signs are posted at appropriate locations throughout the facility to prevent vehicles from damaging aboveground piping and appurtenances. All aboveground piping is located within areas that are not accessible to vehicular traffic (i.e., inside diked area). Brightly painted bollards are placed where needed to prevent vehicular collisions with equipment.

9.21 Discharge Response

This section describes the response and cleanup procedures in the event of an oil discharge. The uncontrolled discharge of oil to groundwater, surface water, or soil is prohibited by state and possibly federal laws. Immediate action must be taken to control, contain, and recover discharged product.

In general, the following steps are taken:

- Eliminate potential spark sources;
- If possible and safe to do so, identify and shut down the discharge source to stop the flow;
- Contain the discharge with sorbents, berms, fences, trenches, sandbags, or-other material;
- Contact the Facility Manager or his/her alternate:
- Contact regulatory authorities and the response organization; and
- Collect and dispose of recovered products according to regulation.

For the purpose of establishing appropriate response procedures, this Contingency Plan classifies discharges as either “minor” or ‘major,” depending on the volume and characteristics of the material released.

A list of Emergency Contacts is provided in Appendix 9-D. The list is also posted at prominent locations throughout the facility. A list of discharge response material kept at the facility is included in Appendix 9-F.

Response to a Minor Discharge

A minor discharge is defined as one that poses no significant harm (or threat) to human health and safety or to the environment. Minor discharges are generally those where:

- The quantity of product discharged is small (i.e., up to 25 gallons of oil and is not reportable);
- The discharged material posed little or no risk to the environment;
- Discharged material is easily stopped and controlled at the time of the discharge;
- Discharge is localized near the source;
- Discharged material is not likely to reach water;
- There is little risk to human health or safety; and
- There is little risk of fire or explosion.

Minor discharges can usually be cleaned up by Red Giant Oil Recycling personnel. The following guidelines apply.

- Immediately notify the Facility Manager.
- Under the direction of the Facility Manager, contain the discharge with discharge response materials and equipment. Place discharge debris in properly labeled waste containers.
- The Facility Manager will complete the discharge notification form (Appendix H) and attach a copy to this SPCC Plan.
- For discharges of 25-gallons or more of oil, the Facility Manager will call the Utah Department of Environmental Quality at (801) 536-4123. The Ogden City Fire Department can be contacted at 911.

Response to a Major Discharge

A major discharge is defined as one that cannot be safely controlled or cleaned up by facility personnel, such as when:

- The discharge is large enough to spread beyond the immediate discharge area;
- A release in excess of 25-gallons;
- The discharged material enters water;

- The discharge-requires special equipment or training to clean up;
- The discharged material poses a hazard to the environment or human health or safety; or
- There is a danger of fire or explosion.

In the event of a major discharge, the following guidelines apply:

- With the exception of the Facility Manage or other designated emergency response personnel, all workers must immediately evacuate the discharge site via the designated exit routes and move to the designated staging areas at a safe distance from the discharge. Exit routes are included on the facility diagram and posted in the maintenance building, in the office building, and on the outside wall of the outside shed that contains the spill response equipment.
- If the Facility Manager is not present at the facility, the senior on-site person notifies the Facility Manager of the discharge and has authority to initiate notification and response. Certain notifications are dependent on the circumstances and type of discharge. For example, if oil reaches a sanitary sewer, the publicly owned treatment works (POTW) should be notified immediately. A discharge that threatens the Weber River may require immediate notification to downstream users.
- The Facility Manager (or senior on-site person) must call for medical assistance if workers are injured.
- The Facility Manager (or senior on-site person) must notify the fire department or police department.
- The Facility Manager (or senior on-site person) must call the spill response and cleanup contractors listed in the Emergency Contacts list in Appendix 9-G.
- The Facility Manager (or senior on-site person) must immediately contact the Utah Department of Environmental Quality (UDEQ), Division of Emergency Response and Remediation (DERR) at (801) 536-4123 and the National Response Center (888-424-8802).
- The Facility Manager (or senior on-site person) must record the call on the Discharge Notification form in Appendix H and attach a copy to this SPCC Plan.
- The Facility Manager (or senior on-site person) coordinates cleanup and obtains assistance from a cleanup contractor or other response organization as necessary.

If the Facility Manager is not available at the time of the discharge, then the next highest person in seniority assumes responsibility for coordinating the response activities.

Waste Disposal

Wastes resulting from a minor discharge response will be containerized in impervious bags, drums, or buckets. The Facility Manager will characterize the waste for proper disposal and ensure that it is removed from the facility by a licensed waste hauler within two weeks. Wastes resulting from major discharge response will be removed and disposed of by a cleanup contractor.

Discharge Notification

Any size discharge (i.e., one that creates a sheen, emulsion, or sludge) that affects or threatens to affect navigable waters or adjoining shorelines must be reported immediately to the National Response Center (1-800-424-8802). The Center is staffed 24 hours a day.

A summary sheet is included in Appendix H to facilitate reporting. The person reporting the discharge must provide the following information:

- Name, location, organization, and telephone number
- Name and address of the party responsible for the incident
- Date and time of the incident
- Location of the incident
- Source and cause of the release of discharge
- Types of material(s) released or discharged
- Quantity of materials released or discharged
- Danger or threat posed by the release or discharge
- Number and types of injuries (if any)
- Media affected or threatened by the discharge (i.e., water, land air)
- Weather conditions at the incident location
- Any other information that may help emergency personnel respond to the incident

Contact information for reporting discharge to the appropriate authorities is listed in Appendix G and is also posted in prominent locations throughout the facility (e.g., in the office building, in the maintenance building, and at the loading rack/unloading area).

In addition to the above reporting, 40 CFR 112.4 requires that information be submitted to the United States Environmental Protection Agency (EPA) Regional Administrator and the appropriate state agency in charge of oil pollution control activities (see contact information in Appendix G) whenever the facility discharges (as defined in 40 CFR 112 1(b)) more than 1,000 gallons of oil in a single event, or discharges (as defined in 40 CFR 112.1(b)) more than 42

gallons of oil in each of two discharge incidents within a 12-month period. The following information must be submitted to the EPA Regional Administrator within 60 days:

- Name of the facility;
- Name of the owner/operator;
- Location of the facility;
- Maximum storage or handling capacity and normal daily throughput;
- Corrective action and countermeasures taken, including a description of equipment repairs and replacements;
- Description of facility, including maps, flow diagrams, and topographical maps;
- Cause of the discharge(s) to navigable waters and adjoining shorelines, including a failure analysis of the system and subsystem in which the failure occurred;
- Additional preventive measures taken or contemplated to minimize the possibility of recurrence; and
- Other pertinent information requested by the Regional Administrator.

A standard report for submitting the information to the EPA Regional Administrator is included in Appendix J of this Plan.

Cleanup Contractors

Contact information for specialized spill response and cleanup contractors is provided in Appendix 9-D.
Spill kits are located inside the office/warehouse building and adjacent to the secondary containment area. The inventory of response supplies and equipment is provided in Appendix F of this Plan. The inventory is verified on a monthly basis.

9.22 Emergency Procedures

In the case of a fire or explosion at the facility the Facility Manager (or senior on-site person) will call emergency services and evacuate everyone on site according to the evacuation plan.

In the case of an unplanned sudden or non-sudden release of used oil to air, soil or surface water at the facility the Facility Manager (or senior on-site person) will follow the “Response to Discharge” procedures outlined previously in this plan.

Copies of this Contingency Plan will be given to the local police departments, fire departments, hospitals, contractors and State and local emergency response teams to coordinate emergency services.

APPENDIX 9-A

Contingency Plan Maps and Diagrams are located in Attachment 1 of this permit.

APPENDIX 9-B

Facility Inspection Checklists

The following checklists are to be used for monthly and annual facility-conducted inspections. Completed checklists must be signed by the inspector and maintained at the facility, with this Contingency Plan, for at least three years.

Monthly Inspection Checklist

This inspection record must be completed *each month* except the month in which an annual inspection is performed. Provide further description and comments, if necessary, on a separate sheet of paper and attach to this sheet. *Any item that receives "yes" as an answer must be described and addressed immediately.

	Y*	N	Description and Comments
Storage tanks			
Tank surfaces show signs of leakage			
Tanks are damaged rusted or deteriorated			
Bolts, rivets, or seams are damaged			
Tank supports are deteriorated or buckled			
Tank foundations have eroded or settled			
Level gauges or alarms are inoperative			
Vents are obstructed			
Secondary containment is damaged or stained			
Water/product in interstice of double-walled tank			
Dike drainage valve is open or is not locked			
Piping			
Valve seals, gaskets, or other appurtenances are leaking			
Pipelines or supports are damaged or deteriorated			
Joints, valves and other appurtenances are leaking			
Buried piping is exposed			
Loading/unloading and transfer equipment			
Loading/unloading rack is damaged or deteriorated			
Connections are not capped or blank-flanged			
Secondary containment is damaged or stained			
Berm drainage valve is open or is not locked			
Security			
Fencing, gates, or lighting is non-functional			
Pumps and valves are locked if not in use			
Response Equipment			
Response equipment inventory is complete			

Date:_____ **Signature:**_____

Annual Facility Inspection Checklist

This inspection record must be completed *each year.* If any response requires further elaboration, provide comments in Description & Comments space provided. Further description and comments, if necessary, must be provided on a separate sheet of paper and attached to this sheet. *Any item that receives "yes" as an answer must be described and addressed immediately.

	Y*	N	Description and Comments
Storage tanks			
Tank #1			
Tank surfaces show signs of leakage			
Tanks are damaged rusted or deteriorated			
Bolts, rivets, or seams are damaged			
Tank supports are deteriorated or buckled			
Tank foundations have eroded or settled			
Level gauges or alarms are inoperative			
Vents are obstructed			
Tank #2			
Tank surfaces show signs of leakage			
Tanks are damaged rusted or deteriorated			
Bolts, rivets, or seams are damaged			
Tank supports are deteriorated or buckled			
Tank foundations have eroded or settled			
Level gauges or alarms are inoperative			
Vents are obstructed			
Tank #3			
Tank surfaces show signs of leakage			
Tanks are damaged rusted or deteriorated			
Bolts, rivets, or seams are damaged			
Tank supports are deteriorated or buckled			
Tank foundations have eroded or settled			
Level gauges or alarms are inoperative			
Vents are obstructed			
Concrete dike			
Secondary containment is stained			
Dike drainage valve is open or is not locked			

	Y*	N	Description and Comments
Dike walls or floors are cracked or are separating			
Dike is not retaining water (following large rainfall)			
Piping			
Valve seals or, gaskets are leaking			
Pipelines or supports are damaged or deteriorated			
Joints, valves and other appurtenances are leaking			
Buried piping is exposed			
Out-of-service pipes are not capped			
Warning signs are missing or damaged			
Loading/unloading and transfer equipment			
Loading/unloading rack is damaged or deteriorated			
Connections are not capped or blank-flanged			
Rollover berm is damaged or stained			
Berm drainage valve is open or is not locked			
Drip pans have accumulated oil or are leaking			
Security			
Fencing, gates, or lighting is non-functional			
Pumps and valves are locked (and not in use)			
Response Equipment			
Response equipment inventory is incomplete			

Date:_____

Signature:_____

APPENDIX 9-C

Record of Annual Discharge Prevention

Briefings and Training

Briefings will be scheduled and conducted by the facility owner or operator for operating personnel at regular intervals to ensure adequate understanding of this Contingency Plan. The briefings will also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Personnel will also be instructed in operation and maintenance of equipment to prevent the discharge of oil, and in applicable pollution laws rules and regulations Facility operators and other personnel will have an opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

Date	Subjects Covered	Employees in Attendance	Instructor(s)

APPENDIX 9-D

EMERGENCY CONTACTS

Designated person responsible for spill prevention:

Al Foreman, Facility Manager	(817) 202-1070

EMERGENCY TELEPHONE NUMBERS:

Facility

Al Foreman, Facility Manager	(817) 202-1070

Local Emergency Response

Ogden Fire Department	911

Response/Cleanup Contractors

Berkley Environmental	(877) 900-5645

Notification

Utah Department of Environmental Quality	(801) 536-4123	Spills impacting water
	(801) 536-4100	Spills not impacting water
National Response Center	(800)-424-8802	

APPENDIX 9-E

DISCHARGE NOTIFICATION FORM

<table>
<tr><th colspan="2">Part A: Discharge Information</th></tr>
<tr><td colspan="2">General information when reporting a spill to outside authorities:

Name: Red Giant Oil Company LLC
Address: 2785 Industrial Drive
Ogden, Utah
Telephone: (817) 201-1070 (Al Foreman)
Owner/Operator: Red Giant Oil Company LLC
1701 South 3rd St
Council Bluffs, IA 51503
Primary Contact: Al Foreman, Facility Manager
Phone: (817) 202-1070</td></tr>
<tr><td>Type of oil:</td><td>Discharge Date and Time:</td></tr>
<tr><td>Quantity released:</td><td>Discovery Date and Time:</td></tr>
<tr><td>Quantity release to a waterbody:</td><td>Discharge Duration:</td></tr>
<tr><td colspan="2">Location/Source:</td></tr>
<tr><td colspan="2">Actions taken to stop, remove, and mitigate impacts of the discharge:</td></tr>
<tr><td colspan="2">Affected media:
☐ Air ☐ Storm water sewer/POTW
☐ Water ☐ dike/berm/oil-water separator
☐ Soil ☐ other:_____</td></tr>
<tr><td>Notification person:</td><td>Telephone contact:
Business:
24-hr:</td></tr>
</table>

Nature of discharges, environmental/health effects, and damages: Injuries, fatalities or evacuation required?		
Part B: Notification Checklist		
	Date and time	Name of person receiving call
Discharge in any amount		
Al Foreman, Facility Manager Cell: (817) 202-1070		
Discharge in amount exceeding 25 gallons		
Ogden City Fire Department 911		
Utah Department of Environmental Quality (801) 536-4123 Water impacts or (801) 536-4100 Non water impacts		

* The POTW should be notified of a discharge only if oil has reached or threatens sewer drains that connect to the POTW collection system.

APPENDIX 9-F

DISCHARGE RESPONSE EQUIPMENT INVENTORY

The discharge response equipment inventory is verified during the monthly inspection and must be replenished as needed.

Tank Truck Loading/Unloading Area

- Empty 55-gallons drums to hold contaminated material 4
- Loose absorbent material 200 pounds
- Absorbent pads 3 boxes
- Nitrile gloves 6 pairs
- Neoprene gloves 6 pairs
- Vinyl/PVC pull-on overboots 6 pairs
- Non-sparking shovels 3
- Brooms 3
- Drain seals or mats 2
- Sandbags 12

Maintenance Building

- Empty 55-gallons drums to hold contaminated material 1
- Loose absorbent material 50 pounds
- Absorbent pads 1 box
- Nitrile gloves 2 pairs
- Neoprene gloves 2 pairs
- Vinyl/PVC pull-on overboots 2 pairs
- Non-sparking shovels 1
- Brooms 1
- Drain seals or mats 1

APPENDIX 9-G

Agency Notification Standard Report

Information contained in this report, and any supporting documentation, must be submitted to the EPA Region 8 Regional Administrator

Facility	*Red Giant Oil Company LLC*
Owner/operator:	*Red Giant Oil Company LLC* *1701 South 3rd St* *Council Bluffs, IA 51502-2037*
Name of person filing report:	
Location:	*2785 Industrial Drive* *Ogden, Utah*
Daily throughput:	
Nature of qualifying incident(s): ☐ Discharge to navigable water or adjoining shorelines exceeding 1,000 gallons ☐ Second discharge exceeding 42 gallons within a 12-month period.	
Description of facility (attach maps, flow diagrams, and topographical maps):	

Agency Notification Standard Report (cont'd)
Cause of the discharge(s), including a failure analysis of the system and subsystems in which the failure occurred:
Corrective actions and countermeasures taken, including a description of equipment repairs and replacements:
Additional preventative measures taken or contemplated to minimize possibility of recurrence:
Other pertinent information:

The Permittee will maintain a bull horn at the facility as a backup to cell phone communication between personnel during an emergency.

Attachment 4
Training Plan

The Permittee shall follow Conditions I.K.1 through 6 of this permit, as well as the Permittee's training plan described in section 9.14 of Attachment 3.

Attachment 5
Waste Disposal Plan

The Permittee shall follow Conditions I.I.1 through 5 of this permit, as well as the Permittee's waste disposal procedures described in section 2.0 of Attachment 1, section 9.19 of Attachment 3, and section 6.1 of Attachment 6.

Attachment 6
Cleanup and Closure Plan

CLOSURE PLAN

The purpose of this closure plan is to document that the site has not been impacted by used oil activities and outline actions to conduct a targeted investigation of an area previously used for the temporary storage of binned used oil filters prior to their transportation offsite. Used Oil Processor Permit (UOP-0150) for the Red Giant Oil Company (now Red Giant Oil Company LLC) facility located at 2785 Industrial Dr., Ogden, Utah (Figure 1) was issued with the expectation that this facility would receive and process Used Oil. Tankage and ancillary equipment was partially constructed, but due to business considerations, construction was not completed and the facility never operated to receive or process containers or bulk shipments of Used Oil. This Closure Plan, which addresses current plans and site conditions, will replace Attachment 6 of UOP-0150 and supersedes the closure plan originally submitted as Chapter 6 of the permit application.

6.1 OPERATIONAL BACKGROUND

This section summarizes the history of the site and details the known existing conditions of the facility. Construction was only partially completed for the facility; therefore, the facility was never put into bulk used oil operation. The used oil filters and their associated containers were removed from the site in 2015.

6.1.1 CURRENT CONDITIONS

The existing infrastructure at the site consists of a concrete tank containment containing 9 unused tanks adjacent to a truck loading pad and the rail spur, and an office/warehouse building containing 3 tanks for virgin oil products storage. The property is secured from the public with a fence around the N, E, and S property boundary as shown on Figure 2.

Each of the 9 tanks located in the containment area is currently empty and has never been put into use. The largest individual unused storage tank has a design capacity of 51,000 gallons. Adjacent to the pad, to the north-west, is a hot oil treater that also has never been used. The warehouse/office building also has never stored any used oil. The only used oil materials managed at the site were used oil filters from vehicle maintenance. These filters were temporarily stored in bins at the facility while awaiting transport offsite.

6.2 CLOSURE PROCEDURES

This section details actions planned to verify the site has not been impacted by used oil activities. Site closure will involve inspection of the facility infrastructure including tanks equipment and piping that are reasonably accessible. It is intended that the never used tanks and equipment would be administratively closed by the Utah Department of Environmental Quality (UDEQ) with respect to used oil management but that the valuable tanks and equipment would be left in place. A surface and subsurface investigation will take place in areas where oil filters contained in portable bins were previously stored.

6.2.1 SITE INSPECTION/INVESTIGATION

A general inspection will be conducted to the extent practical, to document that tanks and equipment mentioned above show no signs of used oil management and that identified areas where used oil filters were stored are not impacted by used oil spills. UDEQ will be provided 10 days notice of the inspection. The inspection will be documented with photographs.

The targeted site investigation includes the collection of surface and subsurface soil samples for laboratory analysis. Each of the two boring locations shown on Figure 2 will be advanced to approximately 3 feet below ground surface. Boring locations have been pre-selected based on Utah Department of Environmental Quality's knowledge of where used oil filters were temporarily stored at the site. Actual boring locations will be selected by a Red Giant Oil LLC contracted consultant, in the field, with input from UDEQ, should UDEQ desire to be present during the field event. Notification of the planned onsite investigation will be provided to UDEQ 10 days in advance. Should there be visible signs of used oil impacts within the general area of a planned boring, the boring will be moved from the pre-selected location to the location of the visible impacts. Each boring will be advanced by a vehicle mounted geo-probe or similar equipment.

Each boring will result in four soil samples being collected for laboratory analysis. A surface soil sample will be collected from the top portion of the soil, then subsequent soil samples will be collected from one-foot intervals to the bottom of the boring depth (3 feet or bottom of visual impacts). Should the boring be in an area where asphalt is present, the surface soil sample will be collected from below the asphalt. In addition to the samples described above, a blind duplicate sample will be collected for laboratory data validation purposes.

Each soil sample will be collected directly from a continuous core provided by the geoprobe. The geoprobe core will be measured from top to bottom and samples will be collected from the proposed depths. The outer portion of the core will be segregated from the sample to avoid any potential contamination smearing as the geoprobe advances into the ground. Samples will then be placed into containers provided by the

analytical lab and will be identified with location and time of collection. Field personnel will wear disposable nitrile gloves, or similar, when handling samples themselves, or equipment that may come into contact with the samples to avoid potential cross contamination. Remaining material from the core, not used for sampling, will be returned to the general location where the core was taken.

Soil samples will be packaged, iced and shipped with a chain of custody to Test America laboratory located in Nashville, TN, a UDEQ-approved laboratory. The laboratory will run each soil sample for semi volatile organic compounds (SVOCs) via SW-846 Method 8270 including polycyclic aromatic hydrocarbons (PAHs), as shown in Table 1. Results will be compared to the U. S. Environmental Protection Agency's (EPA's) Regional Screening Levels (RSLs) as shown in Table 1. Analytical results below the EPA's RSL will result in no further action required. As noted in Table 1, the following analytes have a reporting limit (RL) greater than EPA's residential soil and/or industrial soil RSLs:

Bis(2-chloroethyl)ether

Hexachlorobenzene

N-Nitrosodi-n-propylamine

Benzidine

N-Nitrosodimethylamine

For these analytes and for others with elevated method detection limits (MDLs) or RLs due to sample effects, a non-detect result at a reporting limit greater than EPA's RSL will not justify further action, since verification of level lower than EPA's RSL is not achievable in the lab.

Soil investigation results will be used to determine if any remediation is necessary and/or if necessary, to outline a plan for remediation. Remediation activities would likely involve excavation and off-site disposal of contaminated soils. If remediation activities are deemed necessary, RGO will consult with UDEQ on their scope will subsequently collect confirmation samples demonstrating remedial objectives were met. When analytical results from confirmation samples are below the EPA's RSLs, the results will support site closure with no further action. Although the goal is to meet residential RSLs, since the facility is located in an industrial area, a closure meeting industrial RSLs may be considered if approved by UDEQ.

If groundwater is encountered during the soil investigation, it shall be sampled for the same analytes as the soil, using the appropriate EPA methods, and compared to EPA RSLs.

A Level IV data validation report, will be submitted to UDEQ within 30 days of receipt of laboratory data.

6.3 REPORTING AND CLOSURE CERTIFICATION

Unless remediation is required, within 60 days following the completion of the site inspection, investigation, and UDEQ's approval of the Level IV data validation report, a closure report will be submitted detailing soil investigation results. The closure report will also include inspection photographs of the infrastructure that was proposed for used oil management, but never placed into service. The closure report, signed by a Utah Registered Professional Engineer, will certify that the facility has been closed in accordance with R315-15-11.4 and the specifications of this Closure Plan.

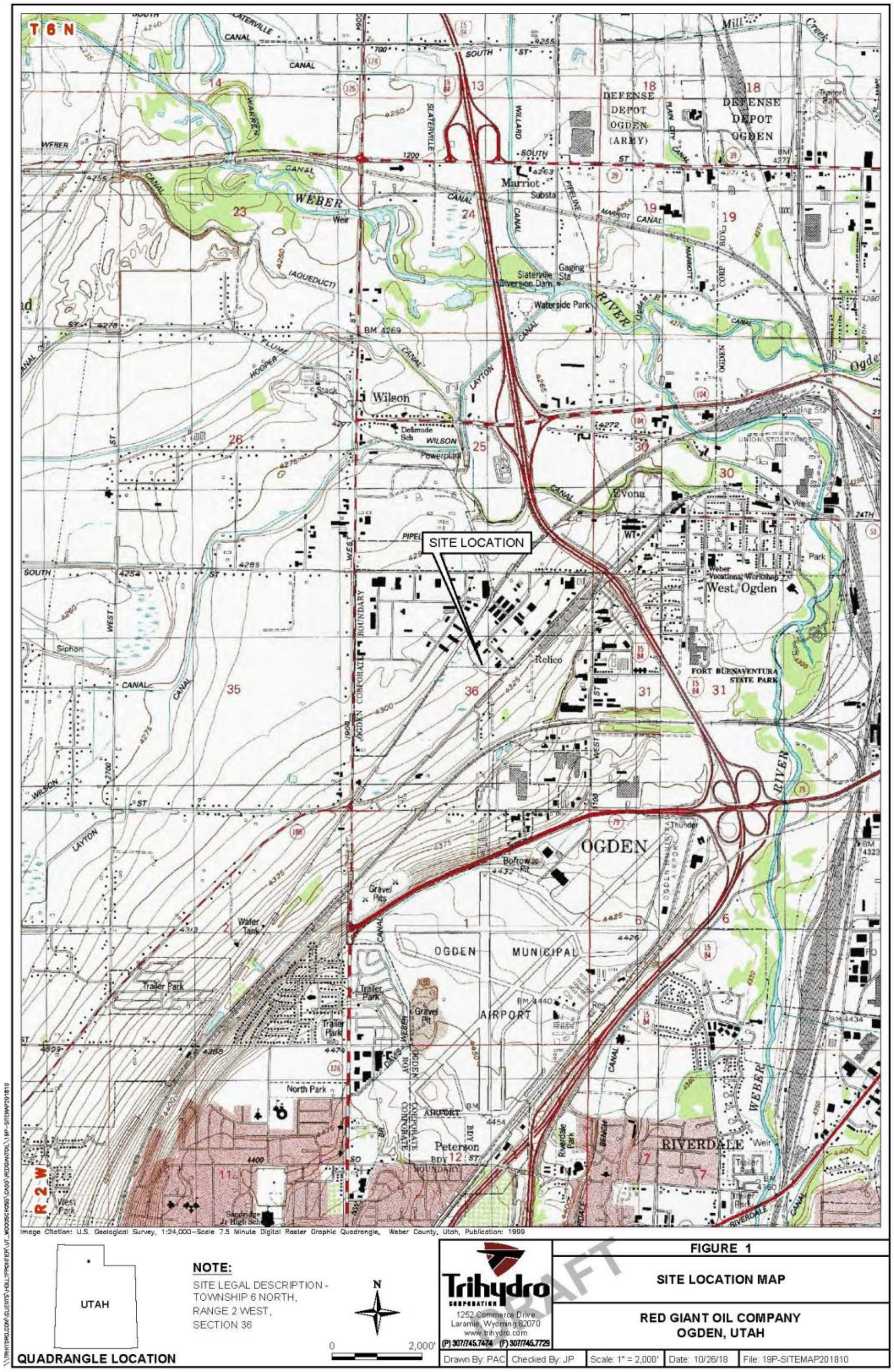
6.4 CLOSURE COSTS

Financial assurance for closure activities in the amount of $99,179.38 is maintained as a current permit condition. This amount was calculated to cover removal of 201,000 gallons of used oil, cleaning and decommissioning of used oil tanks and infrastructure and a full-facility investigation of potential contamination due to spills or leaks from used oil handling. Given that this facility was never operational for bulk used oil handling and that the infrastructure (tanks, ancillary piping, equipment, and containment structures) is clean and will be left in-place, the coverage is more than adequate to cover the limited closure activities described in this plan. Closure cost estimates as of 2015 are detailed in Table 2 below. They have subsequently been adjusted for inflation,

6.5 REFERENCES

EPA. 2018. *Summary RSL May 2018 HQ10 PDF*. Available from: https://semspub.epa.gov/work/HQ/197414.pdf.

UDEQ. 2015. *Used Oil Processor Permit (UOP-0150).*


SITE LOCATION
OGDEN
West Ogden
OGDEN MUNICIPAL AIRPORT
RIVERDALE
Image Citation: U.S. Geological Survey, 1:24,000-Scale 7.5 Minute Digital Raster Graphic Quadrangle, Weber County, Utah, Publication: 1999
UTAH
QUADRANGLE LOCATION
NOTE:
SITE LEGAL DESCRIPTION - TOWNSHIP 6 NORTH, RANGE 2 WEST, SECTION 36
N
0
2,000'
Trihydro
1252 Commerce Drive
Laramie, Wyoming 82070
www.trihydro.com
(P) 307/745.7474 (F) 307/745.7729
FIGURE 1
SITE LOCATION MAP
RED GIANT OIL COMPANY
OGDEN, UTAH
Drawn By: PAC
Checked By: JP
Scale: 1" = 2,000'
Date: 10/26/18
File: 19P-SITEMAP201810


INDUSTRIAL DRIVE
WAREHOUSE BUILDING
BULK OIL STORAGE TANKS
LOADING/UNLOADING RACK
DRAIN
SUMP
RAIL SPUR AND RAIL CAR PARKING AREA
AF
1
2
3
4
5
6
7
8
9
N
0
60'
Image Citation: ©2018 Microsoft Corporation ©2018 DigitalGlobe ©CNES (2018) Distribution Airbus DS Bing Image
EXPLANATION
PROPOSED SOIL BORING (APPROXIMATE LOCATION)
BUILDING
TANK AND NUMBER
ROAD EDGE
FENCE
RAIL SPUR
ASPHALT PAVEMENT
AF ANTIFREEZE
Trihydro CORPORATION
1252 Commerce Drive
Laramie, Wyoming 82070
www.trihydro.com
(P) 3077745.7474 (F) 3077745.7729
FIGURE 2
SITE MAP AND SOIL BORING LOCATIONS
RED GIANT OIL COMPANY
OGDEN, UTAH
Drawn By: PAC
Checked By: JP
Scale: 1" = 60'
Date: 10/29/18
File: 19P-SITE-BORINGS201810

TABLE-1. SVOCs (8270) ANALYTICAL REPORTING AND SCREENING VALUES
2019 USED OIL PERMIT UOP-0150 CLOSURE PLAN
RED GIANT OIL COMPANY OGDEN, UTAH

Analyte	Lab RL (mg/Kg)	Lab MDL (mg/Kg)	Resident Soil RSL (mg/Kg)	Industrial Soil RSL (mg/Kg)
1,2,4,5-Tetrachlorobenzene	0.333	0.169	23	350
2,3,4,6-Tetrachlorophenol	0.333	0.181	1900	25000
2,4,5-Trichlorophenol	0.333	0.218	6300	82000
2,4,6-Trichlorophenol	0.333	0.192	49	210
2,4-Dichlorophenol	0.333	0.175	190	2500
2,4-Dimethylphenol	0.67	0.335	1300	16000
2,4-Dinitrophenol	0.333	0.251	130	1600
2,4-Dinitrotoluene	0.333	0.208	1.7	7.4
2,6-Dinitrotoluene	0.333	0.223	0.36	1.5
2-Chloronaphthalene	0.333	0.209	4800	60000
2-Chlorophenol	0.333	0.191	390	5800
2-Methylnaphthalene	0.067	0.026	240	3000
2-Nitroaniline	0.333	0.207	630	8000
2-Methylphenol	0.333	0.216	3200	41000
2-Nitrophenol	0.333	0.243	--	--
3&4 Methylphenol	0.333	0.203	3200	41000
3,3'-Dichlorobenzidine	0.67	0.204	1.2	5.1
3-Nitroaniline	0.67	0.23	--	--
4,6-Dinitro-2-methylphenol	0.333	0.229	5.1	66
4-Bromophenyl phenyl ether	0.333	0.205	--	--
4-Chloro-3-methylphenol	0.333	0.168	6300	82000
4-Chloroaniline	0.333	0.227	--	--
4-Chlorophenyl phenyl ether	0.333	0.201	--	--
4-Nitroaniline	0.67	0.238	2.7	11
4-Nitrophenol	0.67	0.382	-	-
Acenaphthene	0.067	0.032	3600	45000
Acenaphthylene	0.067	0.029	--	--
Acetophenone	0.333	0.186	7800	120000
Anthracene	0.067	0.029	18000	230000
Atrazine	0.333	0.168	2.4	10
Benzo[a]anthracene	0.067	0.03	1.1	21
Benzo[a]pyrene	0.067	0.027	0.11	2.1
Benzo[b]fluoranthene	0.067	0.028	1.1	21
Benzo[g,h,i]perylene	0.067	0.033	--	--
Benzo[k]fluoranthene	0.067	0.027	11	210
Benzaldehyde	0.67	0.254	170	820
Bis(2-chloroethoxy)methane	0.333	0.2	190	2500
Biphenyl	0.333	0.189	47	200
Bis(2-chloroethyl)ether	**0.333***	0.213	0.23	1
bis (2-chloroisopropyl) ether	0.333	0.198	3100	47000
Butyl benzyl phthalate	0.333	0.215	290	1200
Bis(2-ethylhexyl) phthalate	0.333	0.207	39	160
Carbazole	0.333	0.207	--	--
Caprolactam	0.333	0.155	31000	400000
Chrysene	0.067	0.037	110	2100
Dibenz(a,h)anthracene	0.067	0.032	0.11	2.1
Dibenzofuran	0.333	0.21	73	1000
Diethyl phthalate	0.333	0.212	51000	660000
Dimethyl phthalate	0.333	0.207	--	--
Di-n-butyl phthalate	0.333	0.211	6300	82000
Fluorene	0.067	0.029	2400	30000
Di-n-octyl phthalate	0.333	0.178	630	8200
Hexachlorobenzene	**0.333***	**0.25***	0.21	0.96
Hexachlorobutadiene	0.333	0.167	1.2	5.3
Hexachlorocyclopentadiene	0.333	0.15	1.8	7.5
Hexachloroethane	0.333	0.181	1.8	8
Indeno[1,2,3-cd]pyrene	0.067	0.029	1.1	21
Isophorone	0.333	0.188	570	2400
Naphthalene	0.067	0.029	3.8	17
Nitrobenzene	0.333	0.201	5.1	22
N-Nitrosodi-n-propylamine	**0.333****	**0.194***	0.078	0.33
n-Nitrosodiphenylamine(as diphenylamine)	0.333	0.053	6300	82000
Pentachlorophenol	0.67	0.266	1	4
Phenanthrene	0.067	0.034	--	--
Phenol	0.333	0.203	19000	250000
Pyrene	0.067	0.034	1800	23000
Fluoranthene	0.067	0.034	2400	30000
1,2,4-Trichlorobenzene	0.333	0.181	24	110
1,2-Dichlorobenzene	0.333	0.19	1800	9300
1,3-Dichlorobenzene	0.333	0.19	--	--
1,4-Dichlorobenzene	0.333	0.196	2.6	11
Benzidine	**0.333****	**0.204****	0.00053	0.01
Benzyl alcohol	0.333	0.194	6300	82000
N-Nitrosodimethylamine	**0.333****	**0.02***	0.002	0.034

Notes:
-- Data Unavailable
*** Concentration exceeds Resident Soil RSL**
**** Concentration exceeds both the Resident Soil RSL and Industrial Soil RSL**
SVOC - semi volatile organic compounds

Table 6-2
Estimated Facility Closure Costs
Red Giant Oil, Ogden, Utah

Item	Units	Unit Cost	Item Cost
Characterization and Removal of Used Oil, Used Oil Filters, Anti-freeze			
Sample Remaining Used Oil			
Total Halogen Analysis[1]	10 samples	$ 60.00 /sample	$ 600.00
Off-Site Transportation of Used Oil			
Pump, remove, and haul used oil[2]	297400 gallons	$ 0.08 /gallon	$ 23,792.00
Pump, remove, and haul antifreeze[3]	5000 gallons	$ 0.50 /gallon	$ 2,500.00
Subtotal			**$ 26,892.00**
Decommissioning and Removal of Tanks, Piping, Secondary Containment, and Loading Areas			
Rinse ASTs and Piping and Dispose Rinsate			
Rinse Tanks	5000 gallons	$ 0.50 /gallon	$ 2,500.00
Water Samples (hydrocarbons)[1]	4 samples	$ 125.00 /sample	$ 500.00
Dispose Water	5000 gallons	$ 0.50 /gallon	$ 2,500.00
Off-Site Transport/Disposal of Tank Bottom Sediments			
Total Halogen Analysis[1]	10 samples	$ 60.00 /sample	$ 600.00
RCRA Metals Analysis[1]	10 samples	$ 87.20 /sample	$ 872.00
Sediment Removal and Disposal (non-hazardous)[4]	4 tons	$ 125.00 /ton	$ 500.00
Sediment Removal and Disposal (hazardous)	1 tons	$ 300.00 /ton	$ 300.00
Disassemble Tanks and Piping/Remove Materials			
Dissamble Tanks			$ 15,000.00
Wipe Samples (RCRA metals)[1]	15 samples	$ 160.00 /sample	$ 2,400.00
Remove to scrap metal facility	40 tons	$ 100.00 /ton	$ 4,000.00
Sampling and Off-Site Disposal of Concrete Containments			
Samples (hydrocarbons, RCRA Metals)[1]	5 samples	$ 225.00 /sample	$ 1,125.00
Concrete hauling and disposal (non-contaminated)	40 tons	$ 50.00 /ton	$ 2,000.00
Subtotal			**$ 32,297.00**
Contaminated Soil and/or Concrete Characterization and/or Remediation			
Soil/Groundwater Subsurface Investigation			
Soil Borings	100 feet	$ 15.00 /ft	$ 1,500.00
Soil Samples (TEH, metals, halogens, flash point, PCBs)[1]	10 samples	$ 373.20 /sample	$ 3,732.00
Groundwater Samples (TEH, metals, halogens, PCBs)[1]	2 samples	$ 340.20 /sample	$ 680.40
Geologist (on-site)	24 hours	$ 100.00 /hr	$ 2,400.00
Geologist (report, proj man)	40 hours	$ 100.00 /hr	$ 4,000.00
Remove/Dispose Contaminated Concrete and/or Soil			
Concrete hauling and disposal (contaminated)[4]	20 tons	$ 125.00 /ton	$ 2,500.00
Soil hauling and disposal (contaminated)[4]	100 tons	$ 125.00 /ton	$ 12,500.00
Backfilling and-regrading	100 tons	$ 25.00 /ton	$ 2,500.00
Subtotal			**$ 29,812.40**

Table 6-2 (continued)
Estimated Facility Closure Costs
Red Giant Oil, Ogden, Utah

Item	Units	Unit Cost	Item Cost
Third Party Closure Verification Report			
Professional Engineer	40 hours	$ 100.00 /hr	$ 4,000.00
Total Estimated Closure Costs for Financial Assurance			**$ 93,001.40**

Note: Estimated are in 2014-1015 dollars and were determined from indicated sources or from professional experience with similar activities and types of projects.

Footnotes:

1. Cost estimates provided by Test America, Inc.
2. Assumes that any remaining used oil would be removed by Gem State Recyling.
3. Cost estimate provided by Nuset Industries, Salt Lake City, UT
4. Includes disposal cost for Special Wastes at Wasatch Integrated Waste Management District landfill of $82/ton.